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June 22, 2004

Ms. Deborah Taylor Tate, Chairman
TENNESSEE REGULATORY AUTHORITY
460 James Robertson Parkway
Nashville, Tennessee 37243

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T.R.A. DOCKET ROOM

**Re: Tennessee Coalition of Rural Incumbent Telephone Companies and
Cooperatives Request for Suspension of Wireline to Wireless Number
Portability Obligations Pursuant to Section 251(f)(2) of the
Communications Act of 1934, as Amended
Docket No. 03-00633**

Dear Chairman Tate:

Please find enclosed an original and thirteen copies of the rebuttal testimony filed today in this docket on behalf of the Tennessee Coalition of Rural Incumbent Telephone Companies and Cooperatives. If you have any questions or concerns, please feel free to give me a call.

Sincerely,



Tara L. Swafford

TLS:bb

Enclosures

cc: Timothy C. Phillips, Esq. (w/enc.)
Edward Phillips, Esq. (w/enc.)
Melvin J. Malone, Esq. (w/enc.)
Thomas Moorman, Esq. (w/enc.)

IN RE:

**TENNESSEE COALITION OF RURAL
INCUMBENT TELEPHONE COMPANIES
AND COOPERATIVES REQUEST FOR
SUSPENSION OF WIRELINE TO WIRELESS
NUMBER PORTABILITY OBLIGATIONS
PURSUANT TO SECTION 251(f)(2) OF THE
COMMUNICATIONS ACT OF 1934, AS
AMENDED**

DOCKET NO. 03-00633

**REBUTTAL TESTIMONY OF TERRY WALES
ON BEHALF OF ARDMORE TELEPHONE COMPANY, INC**

1 **Q: PLEASE STATE YOUR NAME, EMPLOYER, BUSINESS ADDRESS, AND**
2 **TELEPHONE NUMBER.**

3 A. Terry Wales, Ardmore Telephone Company, Inc., P.O. Box 549 Ardmore, Tennessee
4 38449.

5 **Q: ON WHOSE BEHALF ARE YOU TESTIFYING?**

6 A. Ardmore Telephone Company, Inc.

7 **Q. PLEASE EXPLAIN HOW YOUR COMPANY CURRENTLY RATES AND**
8 **ROUTES A CALL MADE BY ONE OF YOUR END USERS TO A WIRELESS**
9 **NUMBER.**

10 A. Ardmore hands off such calls to the customer's presubscribed IXC/toll provider.

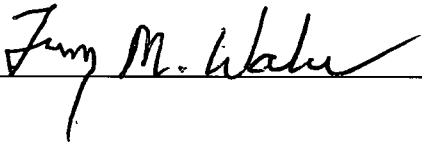
11 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

12 A. Yes.

1 **UNDER PENALTY OF PERJURY I HEREBY AFFIRM THAT THIS IS MY**
2 **SUPPLEMENTAL TESTIMONY IN THIS MATTER ON BEHALF OF ARDMORE**
3 **TELEPHONE COMPANY, INC.**

4

5



Date: 6-21-04

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**TENNESSEE COALITION OF RURAL
INCUMBENT TELEPHONE COMPANIES
AND COOPERATIVES REQUEST FOR
SUSPENSION OF WIRELINE TO WIRELESS
NUMBER PORTABILITY OBLIGATIONS
PURSUANT TO SECTION 251(f)(2) OF THE
COMMUNICATIONS ACT OF 1934, AS
AMENDED**

DOCKET NO. 03-00633

**REBUTTAL TESTIMONY OF RODNEY SCHLIMMER
ON BEHALF OF BEN LOMAND RURAL TELEPHONE COOPERATIVE, INC.**

1 **Q: PLEASE STATE YOUR NAME, EMPLOYER, BUSINESS ADDRESS, AND**
2 **TELEPHONE NUMBER.**

3 A. Rodney Schlimmer, Ben Lomand Rural Telephone Cooperative, Inc. 311 N. Chancery
4 St., McMinnville, TN 37110 (931) 668-4131.

5 **Q: ON WHOSE BEHALF ARE YOU TESTIFYING?**

6 A: Ben Lomand Rural Telephone Cooperative, Inc.

7 **Q. PLEASE EXPLAIN HOW YOUR COMPANY CURRENTLY RATES AND**
8 **ROUTES A CALL MADE BY ONE OF YOUR END USERS TO A WIRELESS**
9 **NUMBER.**

10 A. If the wireless carrier has no reverse billing agreement, the calls are routed to the end
11 user's presubscribed toll provider/interexchange carrier. If the wireless carrier has a
12 reverse billing agreement, the call is sent over trunks that the wireless carrier has to the
13 Ben Lomand office and the wireless carrier is billed the per minute rate. If the wireless
14 carrier has no trunks to the Ben Lomand tandem, the call goes to the BellSouth tandem,
15 and Ben Lomand pays BellSouth their contractual rate and bills the wireless carrier the
16 per minute rate.

17 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

18 A. Yes.
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**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:)	
)	
TENNESSEE COALITION OF RURAL)	
INCUMBENT TELEPHONE COMPANIES)	DOCKET NO. 03-00633
AND COOPERATIVES REQUEST FOR)	
SUSPENSION OF WIRELINE TO WIRELESS)	
NUMBER PORTABILITY OBLIGATIONS)	
PURSUANT TO SECTION 251(f)(2) OF THE)	
COMMUNICATIONS ACT OF 1934, AS)	
AMENDED)	
)	
)	

**REBUTTAL TESTIMONY OF GREGORY L. ANDERSON
ON BEHALF OF BLEDSOE TELEPHONE COOPERATIVE**

1 **Q: PLEASE STATE YOUR NAME, EMPLOYER, BUSINESS ADDRESS, AND**
2 **TELEPHONE NUMBER.**

3 A. Gregory L. Anderson
4 Bledsoe Telephone Cooperative
5 P.O. Box 609, 203 Cumberland Avenue
6 Pikeville, TN 37367

7 **Q: ON WHOSE BEHALF ARE YOU TESTIFYING?**

8 A: Bledsoe Telephone Cooperative

9 **Q. PLEASE EXPLAIN HOW YOUR COMPANY CURRENTLY RATES AND**
10 **ROUTES A CALL MADE BY ONE OF YOUR END USERS TO A WIRELESS**
11 **NUMBER.**

12 A. Bledsoe Telephone Cooperative hands off these calls to the end user's presubscribed toll
13 carrier.

14 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

15 A. Yes.

1 UNDER PENALTY OF PERJURY I HEREBY AFFIRM THAT THIS IS MY
2 SUPPLEMENTAL TESTIMONY IN THIS MATTER ON BEHALF OF

3 Bledsoe Telephone Cooperative

4

5 Gregory S. Anderson

Date: June 18, 2004

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:)	
)	
TENNESSEE COALITION OF RURAL)	
INCUMBENT TELEPHONE COMPANIES)	DOCKET NO. 03-00633
AND COOPERATIVES REQUEST FOR)	
SUSPENSION OF WIRELINE TO WIRELESS)	
NUMBER PORTABILITY OBLIGATIONS)	
PURSUANT TO SECTION 251(f)(2) OF THE)	
COMMUNICATIONS ACT OF 1934, AS)	
AMENDED)	
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**REBUTTAL TESTIMONY OF DAVID DICKEY
ON BEHALF OF CENTURYTEL OF ADAMSVILLE, INC., CENTURYTEL OF
CLAIBORNE, INC., AND CENTURYTEL OF OOLETEWAH-COLLEGEDALE, INC.**

1 **Q: PLEASE STATE YOUR NAME, EMPLOYER, BUSINESS ADDRESS, AND**
2 **TELEPHONE NUMBER.**

3 A. My name is David Dickey. I am employed by CenturyTel Service Group. My business
4 address is PO BOX 405, ADAMSVILLE, TN, 38310. My phone number is 731-632-
5 3311.

6 **Q: ON WHOSE BEHALF ARE YOU TESTIFYING?**

7 A: I am testifying on behalf of CenturyTel of Adamsville, Inc., CenturyTel of Claiborne,
8 Inc., and CenturyTel of Ooletewah-Collegedale, Inc. herein after referred to as
9 CenturyTel.

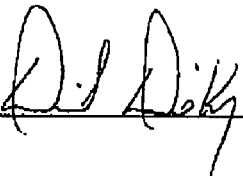
10 **Q. PLEASE EXPLAIN HOW YOUR COMPANY CURRENTLY RATES AND**
11 **ROUTES A CALL MADE BY ONE OF YOUR END USERS TO A WIRELESS**
12 **NUMBER.**

13 A. Our company currently routes the calls onto the BellSouth common trunk group for long
14 distance calls

15 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

16 A. Yes.

1 **UNDER PENALTY OF PERJURY I HEREBY AFFIRM THAT THIS IS MY**
2 **SUPPLEMENTAL TESTIMONY IN THIS MATTER ON BEHALF OF**
3 **CENTURYTEL OF ADAMSVILLE, INC., CENTURYTEL OF CLAIBORNE, INC., AND**
4 **CENTURYTEL OF OOLETEWAH-COLLEGEDALE, INC.**

5 
6 _____

Date: 6-22-04

7

8

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:)	
)	
TENNESSEE COALITION OF RURAL)	
INCUMBENT TELEPHONE COMPANIES)	DOCKET NO. 03-00633
AND COOPERATIVES REQUEST FOR)	
SUSPENSION OF WIRELINE TO WIRELESS)	
NUMBER PORTABILITY OBLIGATIONS)	
PURSUANT TO SECTION 251(f)(2) OF THE)	
COMMUNICATIONS ACT OF 1934, AS)	
AMENDED)	
)	
)	

**REBUTTAL TESTIMONY OF LESLIE GREER
ON BEHALF OF DEKALB TELEPHONE COOPERATIVE D/B/A DTC
COMMUNICATIONS**

1 **Q: PLEASE STATE YOUR NAME, EMPLOYER, BUSINESS ADDRESS, AND**
2 **TELEPHONE NUMBER.**

3 A. Leslie Greer DTC Communications 111 High Street, Alexandria, TN 37012 (615) 529-
4 2151

5 **Q: ON WHOSE BEHALF ARE YOU TESTIFYING?**

6 A: DTC Communications

7 **Q. PLEASE EXPLAIN HOW YOUR COMPANY CURRENTLY RATES AND**
8 **ROUTES A CALL MADE BY ONE OF YOUR END USERS TO A WIRELESS**
9 **NUMBER.**

10 A. Our company currently routes the calls onto the BellSouth common trunk group.

11 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

12 A. Yes.

1 **UNDER PENALTY OF PERJURY I HEREBY AFFIRM THAT THIS IS MY**
2 **SUPPLEMENTAL TESTIMONY IN THIS MATTER ON BEHALF OF ___DeKalb**
3 **Telephone Cooperative, Inc. D/B/A DTC Communications__.**

4
5 *Leslie Green*

Date: 06/21/2004

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:)	
)	
TENNESSEE COALITION OF RURAL)	
INCUMBENT TELEPHONE COMPANIES)	DOCKET NO. 03-00633
AND COOPERATIVES REQUEST FOR)	
SUSPENSION OF WIRELINE TO WIRELESS)	
NUMBER PORTABILITY OBLIGATIONS)	
PURSUANT TO SECTION 251(f)(2) OF THE)	
COMMUNICATIONS ACT OF 1934, AS)	
AMENDED)	
)	
)	

**REBUTTAL TESTIMONY OF ROGER GALLOWAY
ON BEHALF OF HIGHLAND TELEPHONE COOP, INC.**

1 **Q: PLEASE STATE YOUR NAME, EMPLOYER, BUSINESS ADDRESS, AND**
2 **TELEPHONE NUMBER.**

3 A. Roger Galloway, Highland Telephone Coop Inc. P O Box 119 Sunbright TN 37872 423-
4 628-2121.

5 **Q: ON WHOSE BEHALF ARE YOU TESTIFYING?**

6 A: Highland Telephone Coop Inc.

7 **Q. PLEASE EXPLAIN HOW YOUR COMPANY CURRENTLY RATES AND**
8 **ROUTES A CALL MADE BY ONE OF YOUR END USERS TO A WIRELESS**
9 **NUMBER.**

10 A. If a customer makes a call to a wireless company that has dedicated trunks, we will send
11 the calls via this route. If we have no dedicated trunks, the call will be sent over our
12 common trunks as a long distance call using the customer's presubscribed toll provider.

13 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

14 A. Yes.
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1 UNDER PENALTY OF PERJURY I HEREBY AFFIRM THAT THIS IS MY
2 SUPPLEMENTAL TESTIMONY IN THIS MATTER ON BEHALF OF
3 Highland Tel Coop.
4
5 Roger Galloway Date: 6/21/04

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:)	
)	
TENNESSEE COALITION OF RURAL)	
INCUMBENT TELEPHONE COMPANIES)	DOCKET NO. 03-00633
AND COOPERATIVES REQUEST FOR)	
SUSPENSION OF WIRELINE TO WIRELESS)	
NUMBER PORTABILITY OBLIGATIONS)	
PURSUANT TO SECTION 251(f)(2) OF THE)	
COMMUNICATIONS ACT OF 1934, AS)	
AMENDED)	
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**REBUTTAL TESTIMONY OF F. THOMAS ROWLAND
ON BEHALF OF NORTH CENTRAL TELEPHONE COOPERATIVE, INC.**

1 **Q: PLEASE STATE YOUR NAME, EMPLOYER, BUSINESS ADDRESS, AND**
2 **TELEPHONE NUMBER.**

3 A. F. Thomas Rowland, North Central Telephone Cooperative, Inc., 872 E. Hwy. 52 Bypass,
4 P O. Box 70, Lafayette, TN 37083.

5 **Q: ON WHOSE BEHALF ARE YOU TESTIFYING?**

6 A: North Central Telephone Cooperative, Inc.

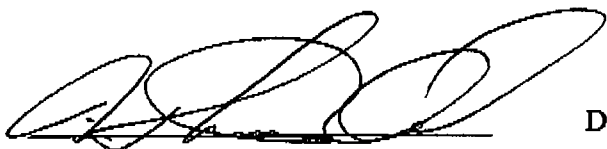
7 **Q. PLEASE EXPLAIN HOW YOUR COMPANY CURRENTLY RATES AND**
8 **ROUTES A CALL MADE BY ONE OF YOUR END USERS TO A WIRELESS**
9 **NUMBER.**

10 A. North Central hands the call off to the end user's presubscribed toll provider.

11 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

12 A. Yes.

**UNDER PENALTY OF PERJURY I HEREBY AFFIRM THAT THIS IS MY
SUPPLEMENTAL TESTIMONY IN THIS MATTER ON BEHALF OF NORTH
CENTRAL TELEPHONE COOPERATIVE, INC.**

A handwritten signature in black ink, appearing to be "J. H. [unclear]", written over a horizontal line.

Date:

6/21/04

1 **BEFORE THE TENNESSEE REGULATORY AUTHORITY**
2 **NASHVILLE, TENNESSEE**

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4
5 **IN RE:**)
6))
7 **TENNESSEE COALITION OF RURAL**)
8 **INCUMBENT TELEPHONE COMPANIES**) **DOCKET NO. 03-00633**
9 **AND COOPERATIVES REQUEST FOR**)
10 **SUSPENSION OF WIRELINE TO WIRELESS**)
11 **NUMBER PORTABILITY OBLIGATIONS**)
12 **PURSUANT TO SECTION 251(f)(2) OF THE**)
13 **COMMUNICATIONS ACT OF 1934, AS**)
14 **AMENDED**)
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23 **REBUTTAL TESTIMONY OF**
24 **MICHAEL E. HICKS**
25 **ON BEHALF OF**
26 **HUMPHREYS COUNTY TELEPHONE COMPANY, TELlico TELEPHONE**
27 **COMPANY AND TENNESSEE TELEPHONE COMPANY (ALL EXCHANGES**
28 **EXCEPT LAVERGNE, HALLS CROSSROADS AND MT.JULIET)**
29

Q: PLEASE STATE YOUR NAME, EMPLOYER, BUSINESS ADDRESS, AND TELEPHONE NUMBER.

A. My name is Michael E. Hicks. I am employed by TDS TELECOM and my current position is Manager - Carrier Relations. My business address is 9737 Cogdill Road, Suite 230, Knoxville, TN 37922 and my business telephone number is 865-671-4505.

Q: ON WHOSE BEHALF ARE YOU TESTIFYING?

A: The TDS petitioning companies Humphreys County Telephone Company, Tellico Telephone Company and Tennessee Telephone Company (all exchanges except LaVergne, Halls Crossroads and Mount Juliet).

Q. PLEASE EXPLAIN HOW YOUR COMPANY CURRENTLY RATES AND ROUTES A CALL MADE BY ONE OF YOUR END USERS TO A WIRELESS NUMBER.

A. If the NPA-NXX rate center of the terminating wireless carrier is inside the TDS exchange's local calling area (including the EAS calling scope), the call is routed over direct interconnection facilities, where they exist, or over a common trunk group to the tandem. Since the rate center is in the TDS local calling area, there are no charges to the end user and TDS receives no intercarrier compensation. If the NPA-NXX of the terminating wireless carrier is outside the TDS exchange's local calling area, the call is routed via the end user's presubscribed interexchange carrier and the end user is billed applicable Message Telephone Service (MTS) tariff rates.

Q. MR. HICKS, I REFER YOU TO THE DIRECT TESTIMONY OF HOKE R. KNOX ON BEHALF OF SPRINTCOM, INC., D/B/A SPRINT PCS PAGE 17, LINE 24. IN HIS TESTIMONY MR. KNOX ADDRESSES THE ISSUE OF 1000

1 **BLOCK NUMBER POOLING.. DO YOU HAVE ANY COMMENTS ON MR.**
2 **KNOX'S TESTIMONY?**

3 A. Yes, I do have some comments. First, as a general observation, I agree, that number
4 conservation is a reasonable public interest objective. However, as the TRA is aware as a
5 result of Docket No. 00-00851, immediate number exhaustion issues have been addressed
6 and as a result of NPA code splits and overlays the current life of Tennessee NPA codes
7 range anywhere from the year 2012 to the year 2021. Accordingly, as a result of TRA's
8 number conservation actions, it is likely the outstanding critical issues relating to the
9 implementation of LNP will be resolved well before current number resources are
10 exhausted. In any event, the requirement to implement 1000 Block Number Pooling is
11 another reason for the TRA to grant the relief requested by Petitioners. As I stated in my
12 direct testimony, many back office systems are driven by the NPA-NXX of the end user
13 making or receiving a call. Therefore, upon implementation of 1000 Block Pooling,
14 changes are required to these systems to operate at a 1000 number block level. These
15 systems include billing, facility records, maintaining a number inventory and acquiring
16 additional numbers from the Number Administrator before the inventory is depleted. It
17 stands to reason that if the implementation of LNP places a burden on Petitioners, then
18 the extra burden of 1000 Block Number Pooling only adds to that burden. Wireless
19 carriers are able to obtain 1000 number blocks from the ILEC today via an arrangement
20 called Type 1 interconnection. Once LNP is deployed at a central office, the
21 interconnection can be migrated to a Type 2 arrangement and the number blocks
22 transferred to the wireless carrier. Thus, if both carriers work together, the TRA's desire

1 for number conservation is not harmed by a grant of the requested relief in this
2 proceeding.

3 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

4 **A Yes.**

UNDER PENALTY OF PERJURY I HEREBY AFFIRM THAT THIS TESTIMONY IS
MY SUPPLEMENTAL TESTIMONY IN THIS MATTER ON BEHALF OF THE TDS
PETITIONING COMPANIES HUMPHREYS COUNTY TELEPHONE COMPANY,
TELLICO TELEPHONE COMPANY AND TENNESSEE TELEPHONE COMPANY
(ALL EXCHANGES EXCEPT LAVERGNE, HALLS CROSSROADS, AND
MT.JULIET).

Michael E. Hick

DATE: June 21, 2004

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**TENNESSEE COALITION OF RURAL
INCUMBENT TELEPHONE COMPANIES
AND COOPERATIVES REQUEST FOR
SUSPENSION OF WIRELINE TO WIRELESS
NUMBER PORTABILITY OBLIGATIONS
PURSUANT TO SECTION 251(f)(2) OF THE
COMMUNICATIONS ACT OF 1934, AS
AMENDED**

DOCKET NO. 03-00633

**REBUTTAL TESTIMONY OF LERA ROARK
ON BEHALF OF CROCKETT, PEOPLES AND WEST TENNESSEE TELEPHONE
COMPANIES, HEREINAFTER REFERRED TO AS "COMPANIES".**

1 **Q: PLEASE STATE YOUR NAME, EMPLOYER, BUSINESS ADDRESS, AND**
2 **TELEPHONE NUMBER.**

3 A. Lera Roark, TEC Services, Inc., 1309 Louisville Avenue, Monroe, Louisiana, 71201,
4 318-322-0015.

5 **Q: ON WHOSE BEHALF ARE YOU TESTIFYING?**

6 A: Crockett, Peoples and West Tennessee Telephone Companies.

7 **Q. PLEASE EXPLAIN HOW YOUR COMPANIES CURRENTLY RATE AND**
8 **ROUTE A CALL MADE BY ONE OF YOUR END USERS TO A WIRELESS**
9 **NUMBER.**

10 A. Our Companies hand off such calls to the end user's interexchange carrier.

11 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

12 A. Yes.

1 **UNDER PENALTY OF PERJURY I HEREBY AFFIRM THAT THIS IS MY**
2 **SUPPLEMENTAL TESTIMONY IN THIS MATTER ON BEHALF OF West**
3 **Tennessee Telephone Company, Peoples Telephone Company and Crockett Telephone**
4 **Company.**

5
6 *Lera Rank* Date: _____

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**TENNESSEE COALITION OF RURAL
INCUMBENT TELEPHONE COMPANIES
AND COOPERATIVES REQUEST FOR
SUSPENSION OF WIRELINE TO WIRELESS
NUMBER PORTABILITY OBLIGATIONS
PURSUANT TO SECTION 251(f)(2) OF THE
COMMUNICATIONS ACT OF 1934, AS
AMENDED**

DOCKET NO. 03-00633

**REBUTTAL TESTIMONY OF DESDA K. PASSARELLA HUTCHINS
ON BEHALF OF LORETTO TELEPHONE COMPANY, INC.**

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**Q: PLEASE STATE YOUR NAME, EMPLOYER, BUSINESS ADDRESS, AND
TELEPHONE NUMBER.**

A. Desda K. Passarella Hutchins
Loretto Telephone Company, Inc.
136 Main Street; P. O. Box 130
Loretto, Tennessee 38469
931/853-4351

Q: ON WHOSE BEHALF ARE YOU TESTIFYING?

A: Loretto Telephone Company, Inc.

**Q. PLEASE EXPLAIN HOW YOUR COMPANY CURRENTLY RATES AND
ROUTES A CALL MADE BY ONE OF YOUR END USERS TO A WIRELESS
NUMBER.**

A. Loretto hands these calls off to the end user's presubscribed toll provider.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes.

1 **UNDER PENALTY OF PERJURY I HEREBY AFFIRM THAT THIS IS MY**
2 **SUPPLEMENTAL TESTIMONY IN THIS MATTER ON BEHALF OF LORETTO**
3 **TELEPHONE COMPANY, INC.**

4
5 *Desda K. Passarella Hutchins* Date: *June 21, 2004*

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**TENNESSEE COALITION OF RURAL
INCUMBENT TELEPHONE COMPANIES
AND COOPERATIVES REQUEST FOR
SUSPENSION OF WIRELINE TO WIRELESS
NUMBER PORTABILITY OBLIGATIONS
PURSUANT TO SECTION 251(f)(2) OF THE
COMMUNICATIONS ACT OF 1934, AS
AMENDED**

DOCKET NO. 03-00633

**REBUTTAL TESTIMONY OF W S HOWARD
ON BEHALF OF MILLINGTON TELEPHONE COMPANY, INC.**

1 **Q: PLEASE STATE YOUR NAME, EMPLOYER, BUSINESS ADDRESS, AND**
2 **TELEPHONE NUMBER.**

3 A. W. S. Howard, Millington Telephone Company, Inc., 4880 Navy Rd., Millington, TN
4 38053

5 **Q: ON WHOSE BEHALF ARE YOU TESTIFYING?**

6 A: Millington Telephone Company, Inc.

7 **Q. PLEASE EXPLAIN HOW YOUR COMPANY CURRENTLY RATES AND**
8 **ROUTES A CALL MADE BY ONE OF YOUR END USERS TO A WIRELESS**
9 **NUMBER.**

10 A. Millington routes all cellular calls to the end user's presubscribed toll provider.

11 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

12 A. Yes.

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1 UNDER PENALTY OF PERJURY I HEREBY AFFIRM THAT THIS IS MY
2 SUPPLEMENTAL TESTIMONY IN THIS MATTER ON BEHALF OF
3 MILINGTON TELEPHONE CO

4
5 W. B. Howard

Date 6-22-04

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE:

**TENNESSEE COALITION OF RURAL
INCUMBENT TELEPHONE COMPANIES
AND COOPERATIVES REQUEST FOR
SUSPENSION OF WIRELINE TO WIRELESS
NUMBER PORTABILITY OBLIGATIONS
PURSUANT TO SECTION 251(f)(2) OF THE
COMMUNICATIONS ACT OF 1934, AS
AMENDED**

DOCKET NO. 03-00633

**REBUTTAL TESTIMONY OF ROBERT D. DUDNEY
ON BEHALF OF TWIN LAKES TELEPHONE COOPERATIVE CORP.**

1 **Q: PLEASE STATE YOUR NAME, EMPLOYER, BUSINESS ADDRESS, AND**
2 **TELEPHONE NUMBER.**

3 A. Robert D. Dudney, Twin Lakes Telephone Cooperative Corp., 201 West Gore Ave., P O
4 Box 67, Gainesboro, TN 38562
5 931 268 2151

6 **Q: ON WHOSE BEHALF ARE YOU TESTIFYING?**

7 A: Twin Lakes Telephone Cooperative, Corp.

8 **Q. PLEASE EXPLAIN HOW YOUR COMPANY CURRENTLY RATES AND**
9 **ROUTES A CALL MADE BY ONE OF YOUR END USERS TO A WIRELESS**
10 **NUMBER.**

11 A. Twin Lakes handles such calls as follows:

12 1. Calls to a Verizon number within the company's rate center are handed to Verizon
13 trunk groups. All other calls are sent to the presubscribed carrier as a toll call.

14 2. Calls to Eloqui within the company's rate center are handed to Eloqui's trunk
15 group. All other calls are sent to the presubscribed carrier as a toll call.

16 3. All calls to AT&T Wireless within our company's rate center are billed on a call
17 code 800 and routed over the toll network.

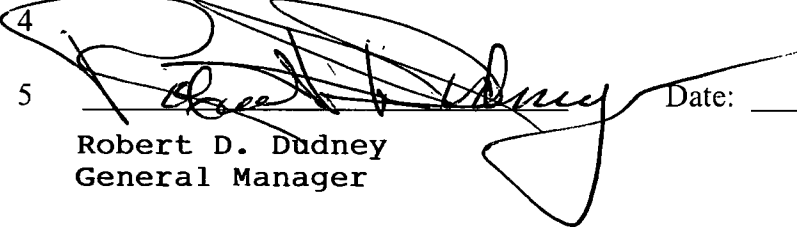
18 4. All calls to Cingular within our company's rate center are handed off to their trunk
19 groups. All other calls are routed to a presubscribed carrier as a toll call.

20 5. All other calls to CMRS providers are sent to a presubscribed carrier as a toll call.

21 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

22 A. Yes.

1 **UNDER PENALTY OF PERJURY I HEREBY AFFIRM THAT THIS IS MY**
2 **SUPPLEMENTAL TESTIMONY IN THIS MATTER ON BEHALF OF**
3 **TWIN LAKES TELEPHONE**
4 **COOPERATIVE CORP.**

5  Date: June 21, 2004
Robert D. Dudney
General Manager

IN RE:

DOCKET NO. 03-00633

**REBUTTAL TESTIMONY OF KERRY WATSON
ON BEHALF OF YORKVILLE TELEPHONE COOPERATIVE**

1 **Q: PLEASE STATE YOUR NAME, EMPLOYER, BUSINESS ADDRESS, AND**
2 **TELEPHONE NUMBER.**

3 A Kerry Watson, Yorkville Telephone Cooperative, 4 Newbern Highway, Yorkville,
4 Tennessee 38389, (731) 643-6121.

5 **Q: ON WHOSE BEHALF ARE YOU TESTIFYING?**

6 A: Yorkville Telephone Cooperative.

7 **Q. PLEASE EXPLAIN HOW YOUR COMPANY CURRENTLY RATES AND**
8 **ROUTES A CALL MADE BY ONE OF YOUR END USERS TO A WIRELESS**
9 **NUMBER.**

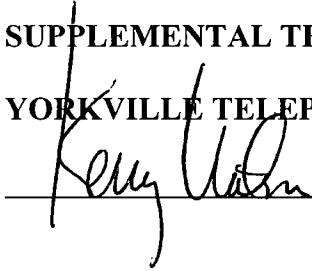
10 A. Yorkville forwards these calls to the end user's long distance provider.

11 **Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

12 A. Yes.

1 **UNDER PENALTY OF PERJURY I HEREBY AFFIRM THAT THIS IS MY**
2 **SUPPLEMENTAL TESTIMONY IN THIS MATTER ON BEHALF OF**
3 **YORKVILLE TELEPHONE COOPERATIVE.**

4



Date: June 18, 2004

IN RE:

**TENNESSEE COALITION OF RURAL)
INCUMBENT TELEPHONE COMPANIES)
AND COOPERATIVES REQUEST FOR)
SUSPENSION OF WIRELINE TO WIRELESS)
NUMBER PORTABILITY OBLIGATIONS)
PURSUANT TO SECTION 251(f)(2) OF THE)
COMMUNICATIONS ACT OF 1934, AS)
AMENDED)**

DOCKET NO. 03-00633

**REBUTTAL TESTIMONY OF STEVEN E. WATKINS
ON BEHALF OF THE
TENNESSEE COALITION OF RURAL INCUMBENT TELEPHONE COMPANIES
AND COOPERATIVES**

1 **Q: PLEASE STATE YOUR NAME, BUSINESS ADDRESS AND TELEPHONE**
2 **NUMBER.**

3 A: My name is Steven E. Watkins. My business address is 2120 L Street, N.W., Suite 520,
4 Washington, D.C., 20037. My business phone number is (202) 296-9054.

5 **Q: ARE YOU THE SAME STEVEN E. WATKINS WHO SUBMITTED PRE-FILED**
6 **TESTIMONY ON JUNE 4, 2004 IN THIS PROCEEDING?**

7 A: Yes, I am.

8 **Q: ARE YOU PROVIDING THIS REBUTTAL TESTIMONY ON BEHALF OF THE**
9 **SAME TENNESSEE INCUMBENT RURAL TELEPHONE COMPANIES AND**
10 **COOPERATIVES THAT HAVE REQUESTED THAT THEIR RESPECTIVE**
11 **INTERMODAL PORTING OBLIGATIONS BE SUSPENDED?**

12 A: Yes, I am.

13 **Q: HAVE YOU REVIEWED THE PRE-FILED TESTIMONY OF WILLIAM**
14 **CHRISPHER JONES AND GREGORY CURTIS COLE ON BEHALF OF CELLCO**
15 **PARTNERSHIP D/B/A VERIZON WIRELESS?**

16 A: Yes, I have.

17 **Q: HAVE YOU REVIEWED THE PRE-FILED TESTIMONY OF HOKE R. KNOX ON**
18 **BEHALF OF SPRINTCOM, INC. D/B/A SPRINT PCS?**

19 A: Yes, I have.

20 **Q: DO YOU HAVE ANY GENERAL OBSERVATIONS ABOUT THESE**

1 **TESTIMONIES?**

2 A: Yes. It appears to me that these wireless carriers provide a lot of statements that simply do
3 not apply to the current request from the Tennessee Coalition members (or at times I refer to
4 them as the “Petitioners”), do not apply to State Commission suspension requests pursuant to
5 Section 251(f)(2) of the Act, or are based on premises that do not apply to the specific relief
6 requested here. My Direct Testimony and that of the individual Coalition members already
7 demonstrates the specific facts and circumstances confronting the Petitioners and the lack of
8 adequate direction from the Federal Communications Commission (“FCC”) on critical
9 transport (*i.e.*, routing) responsibility. These circumstances and lack of direction support the
10 necessary economic, technical infeasibility and public interest determinations required of the
11 Tennessee Regulatory Authority (“TRA”) under Section 251(f)(2) to grant the requested
12 relief. Rather than address these Tennessee specific facts, the wireless carriers' witnesses
13 have misfocused their testimonies away from the critical issues in an attempt to suggest that
14 no relief should be granted. This misfocus is both contrary to the facts and rational public
15 policy.

16 **Q: WHAT DO YOU MEAN THAT THE WIRELESS PROVIDERS ARE RELYING**
17 **UPON PREMISES THAT SIMPLY DO NOT APPLY TO THIS PROCEEDING?**

18 A: There are numerous occasions that statements made by the wireless providers are
19 irrelevant to this proceeding. For example, at page 5 of Mr. Jones' testimony he states
20 that the “Petitioners have known for years that federal law imposed local number
21 portability obligations on them.” He then recites positions taken in an FCC decision and

1 concludes at page 6 that "all of the Petitioners should have known about and begun
2 preparing for intermodal local number portability."

3 **Q: DO YOU AGREE WITH MR. JONES'S OBSERVATIONS?**

4 A: Absolutely not. A complete review of the record before the FCC demonstrates that no
5 one could have anticipated the FCC would reach the conclusions the FCC did in its
6 November 10, 2003 decision regarding intermodal porting ("*Nov. 10 Order*") As I
7 indicated in my testimony, many very difficult issues associated with intermodal porting
8 have been identified and studied by both the FCC and the North American Numbering
9 Council ("NANC"). To date, there has been no proposal or recommendation to resolve
10 these intermodal porting issues. Consequently, there was no reasonable expectation that
11 the FCC would disregard the record and its own announced process and order intermodal
12 Local Number Portability ("LNP") as described in the *Nov. 10 Order*. I do not know
13 how Mr. Jones or any other wireless carrier could possibly suggest that the Petitioners
14 should or could have known that the FCC would reject, without explanation, the expert
15 industry recommendation approach it had promised and adopt such a novel approach to
16 intermodal porting until the issuance of the *Nov. 10 Order*.

17 **Q: ARE THERE ANY OTHER EXAMPLES YOU WOULD LIKE TO NOTE?**

18 A: Yes. On page 8 of Mr. Jones testimony he refers to the FCC's statements in its *First*
19 *Report and Order* implementing Section 251 and Section 252 requirements of the
20 Communications Act of 1934, as amended (the "Act") stating the FCC's original belief
21 that Section 251(f) relief was the exception not the rule. He then cites to a rule provision

1 – Section 51.405(d) of the FCC’s Rules – and references the statement within that rule
2 regarding “undue economic burden beyond the economic burden that is typically
3 associated with efficient competitive entry ” Mr. Jones also offers what the FCC
4 originally determined should be the standard for a waiver of its separate and distinct rules
5 regarding the timing of LNP deployment -- “substantial credible evidence.”

6 **Q: DO YOU AGREE WITH HIS STATEMENTS?**

7 A: No, for several reasons.

8 **Q: WHAT ARE THOSE REASONS?**

9 A: First, the FCC’s original opinion as to what Congress intended in enacting Section 251(f)
10 and its component Section 251(f)(2) was, as I explain below, wrong and does not change
11 the controlling public policy affecting the Coalition members’ rural areas Congress
12 adopted under Section 251(f)(2). Congress determined that it would be better to rely
13 upon State Commissions (like the TRA) which are closer to the specific facts and
14 circumstances within their States to determine whether interconnection requirements
15 should be suspended or modified in ways that would address and balance the economic
16 burdens and special considerations for rural areas with the fundamental movement to
17 more competition. Congress purposely conditioned the manner in which competition
18 would be implemented in a rural area.

19
20 In referring to the FCC's discussion, Mr. Jones cites incorrectly to Section 54.504(d) of
21 the FCC’s Rules. Mr. Jones is apparently unaware that the referenced rule and the FCC's

1 basis for the rule were vacated by the United States Court of Appeals for the 8th Circuit
2 (the “8th Circuit”).

3
4 The FCC initially attempted to invoke an improper interpretation of what is meant by
5 “undue economic burden,” and the 8th Circuit determined that the FCC rule at issue
6 should be stricken. More specifically, as used by Mr. Jones, the Court specifically
7 addressed the concept of undue economic burden as the FCC had originally addressed
8 this concept in the “First Report and Order.” The FCC attempted improperly to narrow
9 the exemption, suspension, and modification provisions of Section 252(f) of the Act, and
10 had adopted Section 51.405 of its Rules. However, on July 18, 2000, on remand from the
11 United States Supreme Court, the United States Court of Appeals for the Eighth Circuit
12 issued its opinion in *Iowa Utilities Board v. Federal Communications Commission*, 219
13 F.3d 744(8th Cir. 2000) (“*IUB II*”), which, *inter alia*, vacated Section 51.405(a), (c) and
14 (d) of the FCC's Rules.

15
16 Through *IUB II*, the 8th Circuit established that the proper standard for determining
17 whether compliance with Section 251(b) or (c) would result in imposing a requirement
18 that is unduly economically burdensome. The 8th Circuit stated that this determination
19 includes “the full economic burden on the ILEC of meeting the request that must be
20 assessed by the state commission” and not just that which is “beyond the economic
21 burden that is typically associated with efficient competitive entry.” 219 F.3d at 761

Moreover, the 8th Circuit emphasized that "undue economic burden" is just one of three alternative bases on which suspension or modification may be granted under § 251(f)(2) - the others being adverse economic impact on users and technical infeasibility.

Q: DOES THE 8th CIRCUIT'S DECISION SUPPORT THE PETITIONERS' POSITION WITH RESPECT TO THEIR REQUEST FOR SUSPENSION OF LNP?

A: Yes it does. According to the 8th Circuit, the FCC attempted unlawfully to limit the interpretation of "unduly economically burdensome," and, therefore, the FCC had "impermissibly weakened the broad protection Congress granted to small and rural telephone companies." 219 F.3d at 761 In no uncertain terms, the 8th Circuit concluded that the FCC's interpretation frustrated the policy underlying the statute and stated "[t]here can be no doubt that it is an economic burden on an ILEC to provide what Congress has directed it to provide to new competitors in § 251(b) or § 251(c)." *Id.*

Q: YOU ALSO MENTIONED ABOVE THE "SUBSTANTIAL CREDIBLE EVIDENCE" REFERENCE FROM THE FCC, IS THAT A CRITERION RELATED TO A SUSPENSION REQUEST?

A: No. That is the third flaw in Mr. Jones' suggested analysis (also suggested by Sprint PCS witness Knox). The particular standard that Mr. Jones references was adopted with respect to the separate and distinct FCC waiver process (*see* Section 52.23(e)) related to the deployment of software and hardware at a company's end office. But this is not a "waiver" petition. A suspension petition addresses more than simply LNP software and

1 hardware deployment as Section 251(f)(2) of the Act states and as the filings made by the
2 Coalition in this proceeding already demonstrate. Moreover, the FCC's separate waiver
3 rule does not address the criteria in Section 251(f)(2) and cannot confine the scope of
4 Congress' specific objectives and requirements regarding a request for suspension under
5 Section 251(f)(2).
6

7 In any event, the FCC recognized *in the very context of LNP* that the Coalition members
8 could seek the relief they request here. Citing Section 251(f)(2), the FCC specifically
9 stated if State commissions exercise this authority, "eligible LECs will have sufficient
10 time to obtain any appropriate Section 251(f)(2) relief as provided by the statute" *In*
11 *the Matter of Telephone Number Portability, First Memorandum Opinion and Order on*
12 *Reconsideration*, 12 FCC Rcd 7236, 7302-03 (1997). Further, the FCC made clear in this
13 same discussion that Section 251(f)(2) relief was an alternative to seeking a waiver from
14 the FCC of its rule.
15

16 Thus, the FCC's standard for a much different waiver process does not govern the
17 proceedings here. It is also misleading and incorrect to suggest that the FCC's decisions
18 regarding waivers of *its* rules somehow governs the issues here (as Mr. Jones suggests on
19 page 9 of his testimony)..

20 **Q: DOES MR. KNOX HAVE SIMILAR MISPLACED OBSERVATIONS?**

21 **A:** Yes. First, Mr. Knox may not be fully aware of what the 8th Circuit has done with

1 respect to the FCC's efforts to minimize the "undue economic burden" inquiry under
2 Section 251(f)(2) because he references at page 14 of his testimony to an Ohio
3 Commission decision that relied on the "undue economic burden" that was specifically
4 rejected by the 8th Circuit. In any event, while other State decisions may be of some
5 interest (including those that have granted relief similar to that requested by the Coalition
6 members which are not mentioned by Sprint PCS), they are not nor could they be
7 controlling on the TRA.

8
9 Second, Mr. Knox's references an FCC decision regarding a FCC rule waiver request by
10 North-Eastern Pennsylvania Telephone Company ("NEP"). Mr. Knox has failed to
11 explain how the facts and circumstances confronting NEP (a LEC operating in
12 Pennsylvania) are relevant to the Tennessee-specific facts and circumstances confronting
13 the specific Coalition members. The NEP matter was a request for temporary waiver
14 before the FCC; NEP is implementing LNP; NEP needed more time as a result of the
15 failure by its equipment manufacturer to deliver necessary functionalities associated with
16 new soft switch installations. While the FCC did not grant the waiver request, it
17 nevertheless gave NEP additional time to get in order the necessary hardware and
18 software with its equipment manufacturer. Regardless, the NEP matter was not a
19 suspension request pursuant to Section 251(f)(2) of the Act. And, as I already explained
20 above, an FCC waiver matter is very much different from one that will review the criteria
21 in the Act under Section 251(f)(2)

1
2 **Q: WHAT RELEVANCE DOES THE FCC'S VIEWS REGARDING LNP**
3 **SUSPENSION REQUESTS HAVE IN THIS PROCEEDING?**

4 A: I am aware that Mr. Jones references the FCC's so-called "Snowden Letter" at page 10 of
5 his testimony (and the Sprint PCS witness does also, but reliance on this letter is
6 misplaced for three reasons).

7
8 First, Mr. Snowden incorrectly refers to "waivers" that are a matter of FCC jurisdiction,
9 not suspensions or modifications pursuant to Section 251(f)(2) that are matters assigned
10 to the jurisdiction of State Commissions. As I explained above, even the FCC recognized
11 the appropriateness of this avenue for relief.

12
13 Second, his letter fails to explain how rural telephone companies like the Coalition
14 members are to solve the technical infeasibility and economic burdens that arise because
15 the FCC has left the issues and implementation details unexplained.

16
17 Third, a thorough review of the Snowden Letter reveals that the actual substance of the
18 letter supports a grant of the Petitioners' suspension requests. The letter asks the
19 President of NARUC to remind state commissions to apply the "appropriate standard of
20 review" to requests under Section 251(f) of the Act. The Petitioners have already
21 demonstrated that grant of their requests is fully consistent with those standards, and

1 beyond that which the 8th Circuit has confirmed and clarified. The Snowden Letter,
2 however, limits its suggestions regarding proper review to include only the “undue
3 economic burden and technically infeasibility” criteria which Congress in Section
4 251(f)(2) specifically did not do. The letter does not address economic burden on rural
5 customers given the lack of demand for intermodal porting.

6
7 In any event, I note that the Mississippi Commission (attached as Exhibit B) and the
8 Georgia Commission (attached as Exhibit C) both granted suspensions to the petitioning
9 companies based on the specific facts and circumstances presented to them. Thus, I do
10 not believe Mr. Jones’ reliance on the Snowden Letter suggests that the TRA should
11 disregard the Tennessee company-specific facts and circumstances that amply
12 demonstrate the need for the suspension of the Coalition’s intermodal LNP obligations.

13 **Q: YOU MENTIONED MISSISSIPPI AND GEORGIA, HAVE ANY OTHER STATE**
14 **COMMISSION’S FOLLOWED SUIT?**

15 A. Yes. Based on a report that I understand was created by Neustar in late May, 2004, there
16 is LNP suspension activity in at least 35 States. (See attached Exhibit C.) The report
17 reflects the fact that activity in each State is different and is based on the facts and
18 circumstances of the carriers in those States and the specific requests. In any event, the
19 majority of those States that have pending suspension requests have granted some relief
20 to the small Local Exchange Carriers (“LECs”) seeking suspension. While an exact
21 count is difficult, on May 20, 2004, there appeared to be 28 States in which requests are

1 still pending or requests had been granted. Nevertheless, it appears that 18 of the 35
2 States have granted either a specific suspension or an interim suspension while the matter
3 is further studied.

4
5 Far from the suggested portrayal of Mr. Jones (and Mr. Knox as explained further below),
6 the majority of the States where the suspension request has been raised have found merit
7 in suspending LNP obligations for the smaller LECs. And for those States that may have
8 denied the requests, it is not at all surprising that some State Commissions may not have
9 fully understood the impact and uncertainty arising from the FCC's less than adequate
10 handling of its confusing LNP orders or the consequences of the issues the FCC has left
11 unresolved.

12
13 Again, however, the activity in other States is based on the specific circumstances within
14 those States. I would urge the TRA and the parties to focus on the policy, facts, public
15 interest, and impact on consumers as it relates to LNP suspension in Tennessee, and the
16 Tennessee company-specific facts that the Petitioners have presented. The TRA is not
17 only in the best position to review these facts as they relate to the rural users in
18 Tennessee, but the TRA is also in the best position to determine the public interest with
19 respect to these users

20 **Q: DO YOU AGREE WITH MR. JONES'S OBSERVATIONS REGARDING THE**
21 **INVESTMENTS INCURRED SHOULD THE REQUESTED SUSPENSION BE**

1 **GRANTED?**

2 A: No I do not. The issues raised by the Petitioners go beyond the end office upgrades that
3 Mr. Jones appears to be focusing on in his comments on pages 10-11 of his testimony.
4 While some costs associated with LNP implementation may be recovered through a
5 surcharge imposed on the Petitioners' own end user customers, there will be other costs
6 incurred by the Petitioners beyond those costs that qualify for the surcharge treatment.
7 And, if an improper form of LNP were imposed or some ill-advised process required of
8 them (such as one that would impose some extraordinary form of interconnection with a
9 requirement that a rural LEC incur transport costs to some distant point beyond their own
10 network), the Coalition members and their end users would be exposed to additional costs
11 in an attempt to comply with those directives, along with the provisioning of the
12 extraordinary network and other business arrangements that such directive may entail.
13 The potential costs to transport traffic to some distant point are potentially unbounded.

14 **Q: WHAT ARE SOME OF THE ROUTING PROBLEMS THAT THE COALITION**
15 **MEMBERS WOULD ENCOUNTER IN ROUTING CALLS TO WIRELESS**
16 **CARRIERS UNDER INTERMODAL PORTING?**

17 A: The numbers that would be ported if intermodal porting were actually required would be
18 numbers that are currently used by wireline end users of the rural LECs. These wireline
19 end users are physically located in the exchange area associated with the specific NPA-
20 NXX. The rural LECs do not have to "route" calls to these numbers when the end user is
21 their own because the wireline end users are physically located in the same exchange area

1 in which the "routing" of calls is initiated. If those numbers were ported to wireless
2 carriers for mobile users, the rural LECs would be presented with the dilemma of how to
3 route calls to those numbers where completion of the call must now involve routing to a
4 wireless carrier beyond the LEC's own network. If there is no interconnection and/or
5 business arrangements in place with wireless carriers to route these calls to those wireless
6 carriers as local exchange service calls, routing of these calls would likely be as an
7 interexchange call (as most of the Petitioners currently do) which would cause significant
8 customer confusion. The other option, presuming that the carriers want to continue to
9 treat calls to the ported numbers as local calls, would be to send these calls through an
10 intermediary, but the interconnection rules do not require such superior forms of
11 interconnection arrangements and that option would expose the companies to new and
12 extraordinary costs which have not been addressed. Moreover, the arrangements that
13 would allow this latter option are not currently in place for most of the LECs with most of
14 the wireless carriers. My discussion here highlights the issues that are unresolved
15 because the FCC has not addressed the routing issues. While the FCC recognized that
16 routing issues remain with respect to intermodal LNP, the FCC decided to address these
17 issues at a later time.

18 **Q: DO ANY OF WIRELESS PROVIDERS IN THIS PROCEEDING INDICATE**
19 **THAT THEY EXPECT THE COALITION MEMBERS TO BE REQUIRED TO**
20 **PAY THIS TRANSPORT?**

21 **A:** Yes. In its response to the Coalition's Discovery Request No. 4, Sprint PCS states that

1 “[u]nder current federal law, the originating carrier bears the responsibility for delivery of
2 their [sic] traffic to the terminating party.”

3 **Q: DO YOU AGREE WITH THIS STATEMENT?**

4 A: No. This is the issue that the FCC has left unresolved and could expose small and rural
5 LECs to unwarranted costs or obligations to provision service arrangements that do not
6 exist and are not required of the rural LECs. The Sprint PCS observation about federal
7 law is simply wrong. Sprint PCS apparently failed to read the question that was being
8 asked. The question was directly related to a situation where “Sprint has *no physical*
9 *point of interconnection*” on one of the Petitioner’s network. Mr. Jones’ statement may
10 be correct where the point of connection is on a Petitioner’s network (*i.e.*, physical within
11 the service area of that Petitioner with an *actual* physical connection with the Petitioner’s
12 network), but Mr. Jones’ statement is simply wrong based on the general forms of *so-*
13 *called indirect interconnection* that exist today between the majority of the Coalition
14 members and wireless providers.

15
16 In any event, Sprint PCS’ statement addresses one of the underlying core issues being
17 addressed in the TRA’s arbitration proceedings. Accordingly, Sprint PCS’ statement
18 forms an independent basis for the TRA to grant the suspension to the Coalition members
19 in this proceeding.

20
21 First, Sprint PCS’ statement makes clear that it wants to impose undue and untold

1 uneconomic burdens upon the Coalition members for transport beyond their respective
2 networks --obligations they *do not* have today and are not required of them.

3
4 Second, Sprint PCS's statements demonstrate why a "piecemeal" approach to the
5 resolution of the interconnection issues between a Petitioner and a wireless provider may
6 result in the TRA reaching a conclusion that has unintended results – the imposition of
7 extraordinary *and entirely new obligations and costs* upon the Coalition members. This
8 is exactly the reason why the Petitioners requested that the TRA resolve the
9 interconnection/transport issues based on the full record in the arbitration.

10
11 Without the requested suspension, therefore, the Coalition members would have to
12 endure the economic burden of attempting to implement some uncertain service and
13 porting method. That attempt, in turn, would require them to incur costs that may go
14 unrecovered.

15
16 Mr. Jones's discussion of routing issues is, in reality, merely an attempt to impose
17 extraordinary and unfair transport obligations on the rural LECs far beyond those that
18 actually apply. His comments have more to do with burdening the rural LECs with
19 transport than with any interest in LNP.

20 **Q: THE WIRELESS CARRIERS COMMENTS AND TESTIMONY SUGGEST**
21 **THAT THE COALITION MEMBERS SHOULD BE REQUIRED TO**

1 **PROVISION NETWORK AND/OR CREATE NEW ARRANGEMENTS FOR**
2 **THE DELIVERY OF LOCAL CALLS TO SOME INTERCONNECTION POINT**
3 **BEYOND THE RURAL LECS' NETWORKS. DO THE LOCAL**
4 **COMPETITION INTERCONNECTION RULES, OR ANY OTHER**
5 **REGULATION, REQUIRE THE PETITIONERS TO PROVISION LOCAL**
6 **SERVICES TO DISTANT POINTS BEYOND THEIR OWN NETWORKS?**

7 A: No. And this is the primary issue left unresolved by the FCC.

8
9 For several reasons, the Petitioners are not required to provision services beyond their
10 own networks, to purchase services from other carriers, or to deliver local exchange
11 carrier service calls to points of interconnection beyond the Petitioners' own networks:

12
13 The interconnection obligations established under the Communications Act of 1934, as
14 amended (the "Act") apply with respect to the service area of the incumbent LEC, not the
15 service area of some other LEC:

16 For purposes of this section, the term 'incumbent local exchange carrier' means,
17 with respect to an area, the local exchange carrier that (A) on the date of enactment
18 of the Telecommunications Act of 1996, provided telephone exchange service in
19 such area

20 47 U.S.C. § 251(h), (underlining added)

21
22 It has long been established that the Act does not require an incumbent LEC to provision,

1 at the request of another carrier, some form of interconnection arrangement that is superior
2 or extraordinary to that which the LEC provisions for itself. The LEC's obligations are
3 only to provide interconnection arrangements that are at least equal to those that the LEC
4 provides for itself and its own service, not superior. However, the suggestion by wireless
5 carriers that a Petitioner could be required to provision local exchange carrier services
6 with transport to some distant point, or to purchase services from some other carrier for
7 transport of traffic beyond the Petitioner's network (e.g., from BellSouth to a BellSouth
8 tandem), would represent just such extraordinary arrangement not required of the
9 Petitioners. While an incumbent LEC may, at the incumbent LEC's sole discretion,
10 voluntarily agree to extraordinary arrangements, the LEC would not do so unless the
11 carrier requesting such extraordinary arrangement is prepared to compensate the
12 incumbent LEC or be responsible for the extraordinary costs for any such superior
13 arrangement.

14
15 In the same *IUB II* cited above, the 8th Circuit reaffirmed its earlier conclusion, not
16 affected by the Supreme Court's remand, that the FCC had unlawfully adopted and
17 attempted to impose interconnection requirements on incumbent LECs that would have
18 resulted in superior arrangements to that which the incumbent LEC provides for itself. It
19 is now well established that an incumbent LEC is not required to provision some superior
20 form of interconnection service arrangement at the request of another carrier, as suggested
21 by wireless carriers. The 8th Circuit concluded that "the superior quality rules violate the

1 plain language of the Act.” The 8th Circuit also concluded that the standard of “at least
2 equal in quality” does not mean “superior quality” and “[n]othing in the statute requires
3 the ILECs to provide superior quality interconnection to its competitors.” 219 F.3d at
4 757-758.

5
6 It is noteworthy here also to point out that under the invalidated superior quality rule that
7 the FCC had originally adopted, even the FCC in imposing the unlawful requirement to
8 provide some superior form of interconnection had nevertheless also concluded that the
9 LEC should be paid for the extraordinary costs associated with the superior
10 interconnection arrangement. Not only are wireless carriers suggesting a requirement for
11 a superior quality interconnection from the Petitioners, they apparently would also do so
12 without providing any compensation for the extraordinary costs.

13
14 The FCC’s own interconnection rules addressing the exchange of traffic subject to the so-
15 called reciprocal compensation requirements envision only that traffic exchange take
16 place at an “interconnection point” on the network of the incumbent LEC, not at an
17 interconnection point on some other carrier’s network. “Incumbent LECs are required to
18 provide interconnection to CMRS providers who request it for the transmission and
19 routing of telephone exchange service or exchange access, under the plain language of
20 section 251(c)(2).” (underlining added) In the Matter of Implementation of the Local
21 Competition Provisions in the Telecommunications Act of 1996, *First Report and Order*,

1 11 FCC Rcd 15499 at para. 1015. *See also id.* at paras. 181-185. Moreover, Sections
2 251(c)(2)(A)-(C) of the Act states:

3 (2) Interconnection -- The duty to provide, for the facilities and equipment of any
4 requesting telecommunications carrier, interconnection with the local exchange
5 carrier's network-- (A) for the transmission and routing of telephone exchange
6 service and exchange access, (B) at any technically feasible point within the
7 carrier's network, (C) that is at least equal in quality to that provided by the local
8 exchange carrier to itself or to any subsidiary, affiliate, or any other party to which
9 the carrier provides interconnection . (underlining added)

10
11 Therefore, it is a wireless carrier's obligation to provision its own network or arrange for
12 the use of some other carrier's facilities outside of the incumbent LEC's network as the
13 means to establish that "interconnection point" on the network of the incumbent LEC. It
14 is obviously not technically feasible for an incumbent LEC to establish an interconnection
15 point on its network at a point where the incumbent is neither a service provider nor has
16 any network.

17
18 LECs such as the Petitioners generally do not offer or provide any local exchange calling
19 service to their own customers that would involve transport to distant locations as
20 apparently suggested by the wireless carriers comments. Calls which involve transport to
21 distant locations beyond the networks of the Petitioners are provided by interexchange
22 carriers ("IXCs"), and these calling services are not local exchange carrier services. The

1 Act does not require the Petitioners to begin to offer some new and extraordinary form of
2 local calling to their own customers. The involvement of the Petitioners in such calls is
3 simply the provision of access services to IXCs that are the service providers to the end
4 users.

5
6 Accordingly, there can be no expectation that Petitioners must transport local exchange
7 service traffic to some distant point when the Petitioners have no statutory or regulatory
8 interconnection obligation to do so, and this presents issues that have not been resolved.
9 Whether wireless carriers' suggestion to the contrary equates to a request that is infeasible
10 because it is premised on the fulfillment of a network arrangement that does not exist and
11 for which there is no legal requirement, or a request that imposes undue economic burden
12 on the Petitioners because it would require some extraordinary superior arrangement, it
13 does not really matter because either potential outcome is sufficient to warrant suspension
14 under Section 251(f)(2)(A) of the Act.

15 **Q: DO YOU BELIEVE THAT THE OBSERVATIONS REGARDING VERIZON**
16 **WIRELESS'S COSTS FOR LNP REFERENCED BY MESSRS. JONES AND**
17 **COLE ARE RELEVANT TO THIS PROCEEDING?**

18 A: No. The fact that the FCC has mandated LNP for wireless carriers is not relevant here.
19 The costs being addressed by Section 251(f)(2) are those of a petitioning company (such
20 as Coalition member) and not an intervenor. Possibly, Mr. Jones and Mr. Cole are raising
21 Verizon Wireless' costs as being relevant to the overall public interest finding required by

1 the TRA under Section 251(f)(2).

2 **Q: DO YOU HAVE ANY OTHER COMMENTS ABOUT THE OBSERVATIONS BY**
3 **MESSRS. JONES AND COLE ABOUT VERIZON WIRELESS COSTS?**

4 A: Yes. With respect to Mr. Jones' observations regarding the costs incurred by Verizon
5 Wireless, I take at face value his testimony and that of Mr. Cole that Verizon Wireless
6 has incurred costs associated with implementing LNP, including some undefined costs for
7 a processing center in Tennessee. But that center was established as a company-wide hub
8 to support LNP for all customers of Verizon Wireless, not just those in Tennessee. See
9 attached articles as Exhibit D.

10
11 Contrary to the possible inference left by Mr. Jones, however, the costs of this center
12 were not incurred solely for purposes of intermodal porting in rural Tennessee. In any
13 event, just considering Tennessee, the Coalition members represent only a small
14 percentage of access lines, and an inconsequential percentage of nationwide lines. Based
15 on FCC figures referenced in the Petition, the Coalition members' access lines are only
16 approximately 0.0014% of the 188,000,000 access lines in the nation as of 2002.

17
18 Therefore, if the representations from Mr. Jones and Mr. Cole regarding Verizon
19 Wireless' costs are intended to go to the "public interest" finding required of the TRA
20 (because they are not relevant under Section 251(f)(2)(A)), Mr. Jones cannot seriously
21 contend that this small number of lines will truly be meaningful in any effort, as he states

1 on page 11 of his testimony, to “leverage” the Verizon Wireless “investment in the
2 Petitioners’ serving areas.” With respect to his other observation regarding the
3 “customers opportunity to port their numbers,” the record is equally clear that *the demand*
4 *is not for intermodal porting but for wireless-to-wireless porting.*

5 **Q: WHAT THEN DO YOU SUGGEST THAT THE TRA DO WITH VERIZON**
6 **WIRELESS’ TESTIMONY?**

7 A. Quite frankly, much of Verizon Wireless’ testimony is irrelevant to the issues before the
8 TRA in this proceeding and the Tennessee-specific factual findings the TRA must make.
9 Where relevant, the testimony either actually proves the need for the relief to the
10 Coalition members or does not prove the point that Verizon Wireless may want to make.

11
12 As has been stated before, the Petitioners are requesting that the TRA establish a rational
13 framework for the Coalition members’ implementation of any intermodal porting
14 obligations and to do so based on Tennessee-specific facts and circumstances. As part of
15 that process, the Coalition members are requesting that the TRA consider the fact that the
16 FCC has specifically left unanswered to date critical issues related to the obligation of the
17 Petitioners regarding transport of calls sent to an end user that has ported his/her number
18 to a wireless carrier. Put another way, a delay in requiring intermodal porting under the
19 circumstances confronting the Petitioners is reasonable in order to ensure that the public
20 policy, legal and cost issues are resolved correctly and only once. That result, in the
21 Petitioners’ view, is the most rational and customer-friendly.

1 **Q: DO YOU HAVE ANY GENERAL OBSERVATIONS REGARDING MR. KNOX'S**
2 **TESTIMONY?**

3 A: Yes. Although admittedly in different words, it appears that Mr. Knox raises the same
4 types of issues and concerns as Mr. Jones. For example, Mr. Knox references other State
5 decisions regarding Section 251(f)(2) and intermodal porting suspension requests, FCC
6 recovery for certain LNP costs (for example at page 14), the purported "offsetting
7 benefits" of number portability (at pages 15-16 of his testimony) and a reliance on the
8 FCC's Snowden Letter (at page 16 of his testimony). Accordingly, to the extent Mr.
9 Knox raises the same issues, my testimony rebutting Mr. Jones' position on those issues
10 applies equally to Mr. Knox and Sprint PSC. At the same time, however, Mr. Knox
11 raises new issues that do need to be addressed in order to ensure that the record is not
12 inadvertently muddled and otherwise difficult to reconcile with the absolute facts that
13 confront the Petitioners.

14 **Q: CAN YOU PROVIDE SOME EXAMPLES?**

15 A: Yes. Mr. Knox suggests at page 3 that the relief requested by the Coalition members
16 would result in "effectively an indefinite suspension of their obligations." While that is
17 interesting rhetoric, the fact is that such a conclusion is wrong.

18 **Q: HOW IS MR. KNOX'S CONCLUSION WRONG?**

19 A: The issues confronting the Petitioners – the transport issues are a good example – are not
20 within the control of the Petitioners to resolve. The issues before the Court and the
21 timing of a decision regarding them, just as the FCC's timing of addressing the transport

1 issue, are not within the Coalition members' control. Likewise, the resolution of the on-
2 going TRA proceeding of the interconnection between the Coalition members and various
3 wireless providers (including Sprint PCS) is not within the control of the Petitioners. At
4 the same time, however, the existence of each of these issues is relevant to the relief that
5 the Petitioners are seeking from the TRA, as explained in both my testimony and the
6 testimony filed by a representative of each Coalition member. The fact that these issues
7 are not within the control of the Petitioners to resolve does not mean that the suspension
8 relief arising from this proceeding will be "indefinite."

9
10 No one suggests that the issues will *not* be resolved. Thus, tying the period of the relief
11 to their resolution is entirely reasonable so that intermodal porting can be implemented
12 correctly once and only once by the Petitioners. Further, if the relief granted to the
13 Coalition members is tied to these outstanding issues, Sprint PCS and any other wireless
14 carrier truly interested in offering intermodal porting in the Petitioners' respective service
15 areas will have an incentive to attempt to resolve these issues with the Coalition members
16 in a manner that avoids further litigation.

17
18 Therefore, the TRA should not permit Sprint PCS's inaccurate rhetoric to gloss over the
19 fact that the FCC has failed to properly address all of the critical and necessary issues
20 confronting the Coalition members

21 **Q: DO YOU HAVE ANY OTHER EXAMPLES?**

1 A: Yes. As I indicated above, Mr. Knox references various state commission decisions and
2 an FCC decision at, among other places, pages 7, 8, 13, 14 and 15 of his testimony. As I
3 indicated before, the TRA is in the position to make its determination based on
4 Tennessee-specific facts and circumstances and the overall public interest in Tennessee.
5 This determination, in turn, should be based on the current requirements.

6 **Q: DO YOU AGREE WITH MR. KNOX AT PAGES 9-10 OF HIS TESTIMONY**
7 **REGARDING FOUR ARGUMENTS THAT HAVE BEEN REJECTED BY THE**
8 **FCC?**

9 A: No. While Mr. Knox is correct that the FCC has stated its view that the version of
10 intermodal porting it adopted is not “geographic portability” under the Act. That issue is
11 on appeal and otherwise is, at best, difficult to reconcile with the facts outlined in my
12 testimony at, for example, pages 14-19.

13
14 Second, while Mr. Knox is correct that the FCC determined that interconnection
15 agreements are not required in some circumstances, his statement is incomplete. What
16 Mr. Knox does not address is the fact that while the FCC purportedly preempted the
17 TRA’s oversight of interconnection agreements in the limited context of intermodal
18 porting, the FCC also stated at paragraph 34 of its *Nov. 10 Order* that “We find that
19 wireless carriers need not enter into section 251 interconnection agreements with wireline
20 carriers *solely for the purpose of porting numbers.*” (emphasis added). The FCC
21 expressed similar sentiments at paragraph 35 of that same decision. Accordingly, even if

1 the TRA's Section 251(f)(2) public interest analysis was confined by the FCC's
2 statements (a proposition that the Petitioners dispute), the fact remains that the
3 obligations being addressed in this proceeding with respect to the wireless carrier may not
4 "solely" be with respect to intermodal porting. Rather, the obligations presented by the
5 facts in this proceeding *also include* the need to establish all necessary network and
6 business terms and conditions required to ensure the seamless exchange of end user
7 traffic.

8
9 Moreover, the concept requiring a direct interconnection (and thus allowing a carrier to
10 avail itself of the Act's transport and termination structure) that Mr. Knox raises on page
11 9 is at the core of many of the issues already before the TRA is an arbitration proceeding

12 In any event, any reference to "direct" connection cannot possibly, or rationally, be
13 construed to mean that the Coalition members' transport responsibility extends beyond
14 their respective networks today. If that is what Mr. Knox wanted to say, the possibility of
15 the additional costs that would be imposed upon a Coalition member actually supports the
16 very undue economic burden that the Petitioners are concerned about.

17
18 Third, Mr. Knox suggests that this proceeding involves some claim that a wireless carrier
19 must obtain its own set of numbers. I am not aware of any contention like this being
20 made by one of the Coalition members in this proceeding. Thus, Mr. Knox's statements

1 can and should properly be disregarded by the TRA as they confuse the issues the TRA
2 needs to address in this proceeding;

3
4 Finally, and although with a different flavor, Mr. Knox states again at page 10 (the last
5 time being at lines 27-28) his incomplete view regarding interconnection obligation. My
6 discussion above applies equally to this assertion by Mr. Knox.

7 **Q: DO YOU AGREE WITH THE INFERENCE LEFT BY MR. KNOX'S**
8 **TESTIMONY THAT YOU ARE CONFUSED ABOUT THE DIFFERENCES**
9 **BETWEEN SERVICE PROVIDER PORTABILITY AND LOCATION**
10 **PORTABILITY, AND WHAT THE FCC HAS ORDERED?**

11 A: No. Although there remains additional issues before the FCC and before the Courts
12 regarding the arbitrary aspects of the FCC's orders related to the FCC's own definition of
13 Service Provider Portability compared to Location Portability, my testimony has
14 emphasized the unresolved issues and inconsistencies in the FCC's order related solely to
15 Service Provider Portability. The FCC's rule definition of Service Provider Portability is
16 the substitution of service using the same number at the same location where the
17 customer receives landline service. The fact that a number is ported to a mobile user of
18 wireless service automatically means that the customer will most certainly *not* use the
19 same number for service "at the same location where the customer receives landline
20 service. In any event, the "at the same location" statutory and rule criterion is rendered
21 meaningless where the wireless carrier does not have a presence in the rate center area

1 that constitutes “at the same location,” or does not have an interconnection arrangement
2 or some other business arrangement over which calls can be routed. My testimony
3 addresses the “at the same location” issue within the original rate center area. There are
4 many additional issues, beyond this proceeding and the scope of my testimony, regarding
5 what meaning to apply with respect to Location Portability.

6 **Q: DO YOU AGREE WITH MR. KNOX THAT THE ROUTING AND RATING**
7 **WILL BE “IDENTICAL” FOR THE COALITION MEMBERS IN AN**
8 **INTERMODAL PORTING ENVIRONMENT?**

9 A: I know he made that claim at page 10, lines 12-15, but I find it difficult to understand
10 how he could sustain his position. Prior to porting a number, the routing of calls is
11 simply to end users served by the LEC and the routing is to those end users physically
12 located within the original rate center. Were a number to be ported to a wireless carrier,
13 the call would have to be routed to some other point, and the particular wireless carrier
14 may or may not have proper interconnection and business arrangement in place for the
15 new routing. In any event, since the issues related to the responsibility of routing of calls
16 beyond a Coalition member’s network responsibility and the costs for such transport have
17 not been resolved and cannot be resolved unilaterally by the Coalition members, the
18 routing of calls is unresolved

19
20 It is also for these reasons that Mr. Knox’s statements on page 12 regarding a porting
21 environment are simply misfocused. Mr. Knox states that “nearly everything about the

1 number will stay the same except a new wireless provider will carry calls to and from the
2 customer.” The number may be assigned to an end user using a different service but the
3 completion of end user traffic – which is also the focus of the Petition and the Coalition
4 members’ intermodal LNP compliance concerns – will change because there will be no
5 terms and conditions are in place with the wireless carrier that ensure the proper transport
6 of the call to the end user served by that wireless provider.

7
8 Finally, Mr. Knox has failed to explain how his reference at page 13 of his testimony to a
9 Sprint PCS’s affiliated telephone company being able to engage in intermodal porting is
10 in any way relevant to this proceeding. Mr. Knox has not provided any facts to show that
11 Sprint’s “local division” (the term used by Mr. Knox) confronts the same economic
12 consequences or lack of connecting arrangements as do the Coalition members, and the
13 same would be true for the Iowa example Mr. Knox provides on page 13.

14 **Q: WHAT IS YOUR REACTION TO MR. KNOX’S STATEMENT ON PAGE 19**
15 **THAT THE COALITION MEMBERS “HAVE DONE EVERYTHING IN THEIR**
16 **POWER TO AVOID LNP’?**

17 A: I trust, as do the Coalition members, that the TRA will see this statement as simply
18 overheated rhetoric. The facts demonstrate that the Coalition members are moving
19 forward as best they can, and that the need for guidance on critical and unanswered issues
20 remains. The combination of all of these factors, in turn, amply demonstrates that the
21 provision of intermodal porting at this time would impose a significant adverse impact on

1 the Coalition members' respective end users, would impose an undue economic burden
2 on the Coalition members and is otherwise not technically feasible. Further, the filings
3 made by and on behalf of the Coalition members also make clear that the suspension
4 being requested for the time it is being requested would serve the overall public interest
5 in Tennessee. As such, Mr. Knox's numerous suggestions throughout his testimony to
6 the contrary are unfounded. All of the elements required under Section 251(f)(2) have
7 been met by each of the Petitioners, and the suspension request should be granted.

8 **Q: DOES THIS END YOUR REBUTTAL TESTIMONY?**

9 **A:** Yes.
10
11
12
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16
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20
21

1 **UNDER PENALTY OF PERJURY I HEREBY AFFIRM THAT THIS IS MY**
2 **REBUTTAL TESTIMONY IN THIS MATTER ON BEHALF OF THE TENNESSEE**
3 **COALITION OF INCUMBENT RURAL TELEPHONE COMPANIES AND**
4 **COOPERATIVES.**

5 
6 _____

Date: 6/21/04

MISSISSIPPI PUBLIC SERVICE COMMISSION

03-UA-918

**IN RE: PETITION OF MISSISSIPPI
INCUMBENT RURAL TELEPHONE
COMPANIES FOR SUSPENSION OF
WIRELINE TO WIRELESS NUMBER
PORTABILITY OBLIGATIONS
PURSUANT TO SECTION 251(F)(2)
OF THE COMMUNICATIONS
ACT OF 1934, AS AMENDED**

**MISSISSIPPI INCUMBENT
RURAL TELEPHONE
COMPANIES**

ORDER

HAVING COME ON for consideration of the Petition of the Mississippi Incumbent Rural Telephone Companies identified in Attachment A ("Independents") requesting suspension of the wireline to wireless number portability obligations pursuant to Section 251(f)(2) of the Communications Act of 1934, as amended (the "Act"). The Commission, being fully apprised in the premises and having considered the documents, pleadings, and the record before it, as authorized by law and the Commission's Public Utilities Rules of Practice and Procedure, and upon recommendation of the Public Utilities Staff, finds as follows:

1. On December 12, 2003, the Independents filed with the Commission their Petition for Suspension of the Federal Communications Commission's local number portability ("LNP") requirement pursuant to Section 251(f)(2) of the Communications Act of 1934, as amended (the "Petition").
2. On December 30, 2003, Sprint Spectrum, L.P. d/b/a Sprint PCS ("Sprint") filed its Petition for Leave to Intervene in this docket, which Petition for Leave to Intervene was granted by Order of the Commission dated January 6, 2004.
3. The Independents and Sprint agreed to submit the case to the Commission for

EXHIBIT

A

decision without a hearing.

4. On April 16, 2004, the Independents submitted their Supplemental Filing. Attachment B to the Supplemental Filing set forth an estimate from each Independent of its cost of implementing in their respective switches the intermodal porting functionality and the related back office/administrative functions necessary to ensure proper internal controls.

5. On April 27, 2004, Sprint submitted its Reply to the Supplemental Filing of the Independents.

6. On May 7, 2004, the Independents filed their Reply Comments.

7. On March 26, 2004, the Commission entered its Order Granting Suspension of Enforcement of Number Portability Deadline of May 24, 2004.

8. The Independents filed their Petition as a result of the decision of the Federal Communications Commission ("FCC") which addressed generally applicable requirements for wireline-to-wireline portability ("intermodal porting"). *In the Matter of Telephone Number Portability, CTIA Petitions for Declaratory Ruling on Wireline-Wireless Porting Issues, Memorandum, Opinion and Order and Further Notice of Proposed Rulemaking*, CC Docket No. 95-116, FCC 03-284, released Nov. 10, 2003 ("November 10 Intermodal Order").

9. The *November 10 Intermodal Order* established a November 24, 2003, deadline for Local Exchange Carriers ("LECs") operating in the top 100 Metropolitan Statistical Areas ("MSAs") that had received a *bonafide* request for intermodal porting. Subsequently, the FCC extended the deadline for compliance with the FCC's intermodal porting obligations for most LECs with less than two percent of the nation's access lines. *In the Matter of Telephone Number Portability Order*, CC Docket No. 95-116, FCC 04-12, released January 16, 2004 (the "2%

Order"). This extension of time was applicable to any LEC with less than two percent (2%) of the nation's access lines operating within the top 100 MSAs that had not received a request for local number porting from a wireline carrier prior to May 24, 2003, or from a wireless carrier with a point of interconnection or numbering resources in the rate centers where the customer's wireline number is provisioned.

10. The Independents demonstrated that they each complied with the Act's eligibility criterion of "fewer than 2 percent" of the nation's subscriber lines required to seek the requested relief. The Commission finds that Congress fully envisioned that the Commission can avail itself of the authority granted under Section 251(f)(2) of the Act to suspend the Independents' respective intermodal porting obligations.

11. Unlike the larger LECs that are the predominant service providers in the top 100 MSAs, the Commission is well aware that the Independents have not generally been required under the FCC's existing rules to deploy number porting capability. In the *2% Order*, this fact, and its impact, is acknowledged. The FCC recognized that smaller LECs like the Independents generally "had not received requests from other wireline carriers for wireline-to-wireline porting prior to May 24, 2003," which requests would result in the need for these smaller carriers to "acquire the hardware and software necessary to provide porting, make the necessary upgrades, and ensure that their upgraded networks work reliably and accurately." On this basis, the FCC found that "special circumstances" existed to extend the implementation date for all affected 2% carriers until May 24, 2004. *2% Order* at paragraph 8.

12. The Independents assert that the end user charge necessary to recover the cost of LNP for their operations will be higher than that previously experienced by, and imposed on

behalf of, the LECs serving in the top 100 MSAs. The Independents contend that this problem will only be compounded by the fact that the Independents have fewer customers per switch and correspondingly higher costs per end user. The company specific information provided by the Independents as Attachment B to their Supplemental Filing of April 16, 2004, demonstrates that each Independent will experience varying levels of cost and will require differing amounts of time to equip their respective switches for porting capability upon the receipt of legitimate porting request from wireless providers. In addition to switch modification costs and software upgrade expenses, the Independents maintain that they will incur recurring expenses with each query or "dip" of the LNP database as well as additional operating expenses directly related to the implementation of LNP, including, but not limited to, translation support efforts, back office implications concerning billing and plant records, LNP dip contracts and various expenses resulting from the receipt and handling of default routed traffic. The Independents further assert that there remain numerous unresolved technical matters associated with the implementation of the FCC's wireline to wireless LNP mandate such as billing and porting issues.

13. The Commission finds that all of the aforementioned facts combine to render the provision of local number portability unduly economically burdensome and technically infeasible at this time. In addition, the Commission finds that unresolved matters related to the issue of whether ported numbers must remain within the rate center wherein they are currently assigned make immediate implementation of the FCC's wireline to wireless LNP mandate impractical.

14. The Commission finds that a grant of the suspension requested would avoid the imposition of a requirement that is technically infeasible. The Independents have noted that a number of billing modifications will have to be made to accommodate wireline-to-wireless LNP.

It is unclear how long it will take to accomplish the necessary modifications.

15. The Commission finds that the costs associated with deploying and properly implementing intermodal porting may be significant, that no end user demand for intermodal has been demonstrated, and that certain of the costs are not yet known.. Further, the Commission finds that the economic burden to the Independents and their respective end users is not justified until further issues resolution is forthcoming from the FCC and the courts with respect to the Independents' intermodal porting obligations. The *November 10 Intermodal Order* and the *2% Order* do not displace the need for this underlying policy consideration. Instead, the issuance of these decisions underscore the need for the Commission to determine whether the economic burden and the potential adverse economic ramifications for rural telecommunications users are outweighed by any speculative competitive public interest benefits. The combination of the known and unknown cost elements demonstrates the substantial adverse economic harm and undue economic burden that will affect the Petitioners and their respective users if the Petitioners' intermodal porting obligations are not suspended.

16. The Commission finds that the requested suspension is consistent with the public interest, convenience and necessity. By granting the suspension requested, the Commission will avoid the potential waste of resources while the further clarifications necessary to effectively and efficiently implement wireline to wireless number portability are undertaken.

The Commission, having jurisdiction of the parties and the subject matter, and having considered the Petition and all the evidence in this docket, and upon recommendation of the Public Utilities Staff, finds that the public convenience and necessity shall be served by the granting of the following relief.

IT IS THEREFORE, ORDERED that:

1. An immediate suspension of the wireline-to-wireless LNP requirements imposed by the FCC with respect to the Independents identified in Attachment A hereto is in the best interest of the consumers of Mississippi, and such suspension is hereby granted pursuant to Section 251(f)(2) of the Act.

2. This suspension shall remain in effect until June 1, 2005, unless otherwise ordered by the Commission, and at that time the Commission shall re-examine the issues concerning wireline-to-wireless LNP.

3. The Commission recognizes that the FCC will most likely address many, if not all, of the issues raised by the Independents and set forth by the Commission herein, however, there can be no assurance when this may be concluded. Accordingly, the Commission instructs the Independents to proceed diligently to ready themselves to the extent possible for the eventual requirement that they meet the wireline-to-wireless LNP requirements.

4. The Commission is concerned about the cost issues raised by the Independents and their possible impact on their customers. Accordingly, the Commission instructs the Independents to consult with the Commission and the Public Utilities Staff on those issues and to proceed to recover their LNP costs in a manner consistent with applicable state and federal laws and regulations.

5. The entire file of the Commission in this Docket is made a part of the record herein.

6. This Order is effective as of the date hereof.

SO ORDERED, this the 24th day of May, 2004.

Chairman Bo Robinson voted Aye, Vice Chairman Nielsen Cochran voted Aye;
and Commissioner Michael Callahan voted Aye.

MISSISSIPPI PUBLIC SERVICE COMMISSION



By:

Bo Robinson
BO ROBINSON, CHAIRMAN

By:

Nielsen Cochran
NIELSEN COCHRAN, VICE CHAIRMAN

By:

Michael Callahan
MICHAEL CALLAHAN, COMMISSIONER

ATTEST: A TRUE COPY

Brian U. Ray
BRIAN U. RAY
EXECUTIVE SECRETARY

ATTACHMENT A

The Mississippi Rural Independent Telephone Companies

Bay Springs Telephone Company	TC-120-0008-00
BPM Noxapater Telephone Company	TC-120-0810-00
Bruce Telephone Company	TC-003-0014-00
Calhoun City Telephone Company	TC-003-0015-00
CenturyTel of North MS, Inc.	TC-003-1178-00
Decatur Telephone Company	TC-100-0005-00
Delta Telephone Company	TC-100-0018-00
Franklin Telephone Company	TC-123-0009-00
Frontier Communications of Mississippi, Inc.	TC-123-1853-00
Fulton Telephone Company	TC-003-0007-00
Georgetown Telephone Company	TC-120-0077-00
Lakeside Telephone Company	TC-020-0865-00
Mound Bayou Telephone Company	TC-100-0866-00
Myrtle Telephone Company	TC-003-1388-00
Sledge Telephone Company	TC-100-0006-00
Smithville Telephone Company	TC-003-0027-00
Southeast Mississippi Telephone Company	TC-020-1055-00

Docket No. 18718-U

In re: Consideration of the request by Bulloch County Rural Telephone Cooperative, Inc., Chickamauga Telephone Company, Citizens Telephone Company, Inc., ComSouth Telecommunications, Inc., GTC, Inc. d/b/a GT COM, Pineland Telephone Cooperative, Inc., Plant Telephone Company, Planters Telephone Cooperative, Inc., Progressive Rural Telephone Co-Op, Inc., Public Service Telephone Company, and Ringgold Telephone Company for Suspension of Wireline to Wireless Number Portability Obligations Pursuant to Section 251(f)(2) of the Communications Act of 1934, as Amended.

ORDER GRANTING LIMITED EXTENSION

On April 6, 2004, the above-listed members of the Georgia Telephone Association ("GTA") filed with the Georgia Public Service Commission ("Commission") a Petition for Suspension ("Petition") requesting suspension of the Federal Communications Commission's ("FCC") deadline for wireline-to-wireless portability ("intermodal portability") in the top 100 Metropolitan Statistical Areas ("MSAs") as outlined in its *November 10, 2003 Intermodal Order*. The deadline for implementation of the FCC's directive is May 24, 2004 and the Petitioners believe that a suspension of that deadline and necessary obligations by this Commission would be critical to protect the public's interest.

The Petitioners requested that the Commission grant the following relief:

A suspension of their respective obligation to provide number portability to a wireless provider until six months following the full and final disposition of the issues and legal challenges associated with porting numbers arising from the actions taken by the FCC between local exchange companies ("LECs") and wireless providers (recognizing that a Petitioner may find it necessary to seek further Section 251(f)(2) relief).

(Petition, p. 2).

In support of their petition, the Petitioners argued that additional time is necessary to comply with the various technical requirements to support number portability in its facilities. *Id.* The Petitioners explain that the lack of interconnection agreements between LECs to facilitate the exchange of traffic also renders implementing intermodal number portability currently infeasible.

Id. at 2-3. In addition to the technical feasibility issues, Petitioners state that denial of its request would impose an economic burden on telecommunications users in the areas served by the ICOs. *Id.* at 4. The Petitioners therefore assert that the relief sought is consistent with the public interest, convenience and necessity. *Id.*

Legal Authority for Granting the Request

The Federal Telecommunications Act of 1996 provides that state commissions may suspend or modify the application of a Section 251(b) requirement for local exchange carriers with fewer than 2 percent of the Nation's subscriber lines installed in the aggregate nation-wide. 47 U.S.C. § 251(f)(2). The requirements in Section 251(b) include the "duty to provide, to the extent technically feasible, number portability in accordance with requirements prescribed by the [FCC]. Petitioners' contention that they each satisfy the criteria in Section 251(f)(2) regarding percentage of the nation's subscriber lines was not contested. Petitioners argue that Section 251(f) indicates that Congress recognized that state commissions would best comprehend if implementation of a requirement would impose an undue economic burden or was technologically infeasible. (Petition, p. 4). The Commission agrees that it has the authority pursuant to Section 251(f)(2) to grant an extension on the May 24, 2004 implementation deadline.

The Commission Staff ("Staff") recommended that the Commission not approve the specific extension requested in the Petition. While finding that there is merit to the Petitioners' arguments that the obligations in the *November 10, 2003 Intermodal Order* are not technically feasible, are unduly economically burdensome, and thus harm the overall public interest, the relief sought is too vague and open-ended. It is not clearly defined as to what would constitute the "final disposition of the issues and legal challenges." Moreover, even if that term was clarified, the length of the extension would remain unknown. Finally, tying the extension to litigation could result in a longer extension than is necessary or justified.

The Staff recommended that the Commission grant an extension of the deadline to December 31, 2004 to give the Petitioners more time to make the necessary modifications to their networks to implement intermodal number portability. In contrast to the relief sought in the Petition, an extension to December 31, 2004 sets a clear and definite deadline. The Staff also recommended that the Petitioners file with this Commission status reports every 60 days during the extension period, with the first report due June 30, 2004. The reports shall detail the current status regarding implementation (i.e. what network upgrades have been implemented as of that date, what network upgrades remain to fully institute intermodal number portability, status of any necessary interconnection agreements, estimated completion date, and any other information the Commission deems appropriate). Should any one of the companies complete the implementation as outlined in the *November 10 Intermodal Order* before a scheduled status report, that company shall send a letter to the Commission stating that implementation is complete. In the absence of any Commission order to the contrary, the failure to comply with the number portability requirements set forth in the *November 10 Intermodal Order* by December 31, 2004 shall be construed as the failure to comply with an order of this Commission and will subject any such company to the sanctions set forth in O.C.G.A. § 46-2-91(a).

The Commission adopts the Staff's recommendation.

WHEREFORE IT IS ORDERED, that the Commission hereby extends the May 24, 2004 deadline for Petitioners to meet the requirements outlined in the FCC's *November 10, 2003 Intermodal Order* to December 31, 2004.

ORDERED FURTHER, Petitioners shall file with this Commission status reports every 60 days during the extension period, with the first report due June 30, 2004. The reports shall detail the current status regarding implementation (i.e. what network upgrades have been implemented as of that date, what network upgrades remain to fully institute intermodal number portability, status of any necessary interconnection agreements, estimated completion date, and any other information the Commission deems appropriate).

ORDERED FURTHER, Should any one of the Petitioners complete the implementation as outlined in the *November 10 Intermodal Order* before a scheduled status report, that company shall send a letter to the Commission stating that implementation is complete.

ORDERED FURTHER, that in the absence of any Commission order to the contrary, the failure to comply with the number portability requirements in the *November 10 Intermodal Order* by December 31, 2004 shall be construed as the failure to comply with an order of this Commission and will subject any such company to the sanctions set forth in O.C.G.A. § 46-2-91(a).

ORDERED FURTHER, that all findings, conclusions and decisions contained within the preceding sections of this Order are adopted as findings of fact, conclusions of law, and decisions of regulatory policy of this Commission.

ORDERED FURTHER, that any motion for reconsideration, rehearing or oral argument shall not stay the effectiveness of this Order unless expressly so ordered by the Commission.

ORDERED FURTHER, that jurisdiction over this proceeding is expressly retained for the purpose of entering such further order or orders as this Commission may deem just and proper.

The above by action of the Commission in Administrative Session on the 18th day of May, 2004.

Reece McAlister
Executive Secretary

H. Doug Everett
Chairman

Date: _____

Date: _____

LNP Waiver Petitions & Decisions

State	Docket #	Carrier(s)	Details & Status	Status	Suspension Date
AL	29138	Blountsville Telephone Brndlee Mountain Telephone Castleberry Telephone CenturyTel Farmers Telephone Coop Frontier Comm of Alabama Frontier Comm of Lamar County Frontier Comm of the South Graceba Total Comm Gulf Telephone Hopper Telecom Milly Telephone Mon-Cre Telephone Coop National Telephone of Alabama New Hope Telephone Coop Otelco Telephone (Oneonta Telephone) Ragland Telephone Roanoke Telephone	11/25/03 Order grants suspension "until further notice" PSC Hearing 4/20/04 Order Approved giving Century Tel until end of July and Other petitioners until end of December	Granted	7/31/04 CenturyTel 12/31/04 Others
AR	03-199-U 03-198-U	Arkansas Telephone Company, Madison County Telephone Company Mt View Telephone Company Ritter Telephone Company Yell County Telephone Company CenturyTel	Extensions granted to 5/24/04 for Yell County and Ritter. Extension requests of Arkansas Telephone Company, Mt View Telephone Company, and Madison County Telephone Company are moot because they have no top 100 MSA exchanges Extension denied for CenturyTel	See Details	See details
AR	04-016-U	Decatur Telephone Company	On 1/20/04, Decatur filed for a two-year suspension On 4/20/04 PSC Granted suspension until 11/24/04 when Decatur Telephone can petition for an additional suspension.	Granted in part	11/24/04
AZ	T-02063A-04-0010	Arizona Telephone	Filed 1/8/04 Western Wireless submitted requests for LNP in November Seeking an indefinite extension Staff recommendation due 6/20/04 On PUC agenda 7/6/04 Procedural Order pending	Pending	
AZ	T-01072B-04-0010	Southwestern Telephone	Filed 1/8/04 Western Wireless submitted requests for LNP in November Seeking a two-year extension Staff recommendation due 6/20/04 On PUC agenda 7/6/04 Procedural Order pending	Pending	
CO	03M-505T	CenturyTel of Eagle	Petition Dismissed as moot based on FCC 1/16/04 Order	Dismissed	
CO	04M-129T	Big Sandy Telecom	Filed 3/19/04 On 4/13/04 agenda PUC granted Big Sandy one-year extension in Simla exchange Western Wireless filed for rehearing	Granted	5/24/05
CO	04M-130T	Sunflower Telephone	Filed 3/19/04 On 4/13/04 agenda PUC granted Sunflower one-year extension for Townner, Sheridan Lakes, and Hartman exchanges Western Wireless filed for rehearing	Granted	5/24/05
CO	04M-131T	Columbine Telecom	Filed 3/19/04 On 4/13/04 agenda Columbine need not implement LNP until 05/24/05 and then not until 6 months after it receives a request It was granted a minimum extension of one year, but it may be longer if the carrier does not receive a	Granted See details	5/24/05

EXHIBIT

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			request by 11/24/04 Western Wireless filed for rehearing		
CO	04M-138T	Agate Mutual Telephone	Filed for extension to 5/24/06 with biennial review of waiver thereafter 4/21/04, PUC granted Agate one-year extension for one exchange Western Wireless filed for rehearing	Granted	5/24/05
CO	04M-137T	Eastern Slope Rural Telephone	Filed for extension to 5/24/06 with biennial review of waiver thereafter PUC granted Eastern Slope one-year extension for 9 exchanges and 6 months for the Bennett exchange in the Denver MSA Western Wireless filed for rehearing	Granted	11/24/04 5/24/04
CO	04M-171T	Roggen Telephone	Filed 4/12/04 5/5/04 PUC granted suspension to 5/24/06	Granted	5/24/06
CO	04M-172T	Peetz Coop	Filed 4/12/04 5/5/04 PUC granted suspension to 5/24/05	Granted	5/24/05
CO	04M-191T	Stoneham Telephone	Filed 4/15/04 5/12/04 PUC granted suspension to 5/24/06	Granted	5/24/06
CO	04M-202T	South Park Telephone	Filed 4/28/04 5/12/04 PUC set for hearing, date TBD	Pending	
CO	04M-203T	Rye Telephone	Filed 4/28/04 5/12/04 PUC set for hearing, date TBD	Pending	
CO	04M-207T	Haxtun Telephone	Filed 4/28/04 5/12/04 PUC granted suspension to 5/24/06	Granted	5/24/06
CO	04M-208T	Wiggins Telephone Assoc	Filed 4/28/04 5/12/04 PUC granted suspension to 5/24/06	Granted	5/24/06
CO	04M-220T	Dubois Telephone	Filed 5/3/04 Staff Recommends shortened notice period On 6/2 PUC agenda	Pending	
CO	04M-221T	PC Telecom	Filed 5/3/04 for 6 mo suspension Staff Recommends shortened notice period On 6/2 PUC agenda	Pending	
FL	040249-TL	GTC/GT Comm (subsidiary of FairPoint Comm)	3/19/04 filed for 12-month extension 4/21/04 Staff Recommendation for 60-day interim suspension to investigate 5/3/04 PSC approved Staff Recommendation	Pending	
FL	040326-TL	Northeast Florida Telephone/NEFCOM	5/11/04 GT Com filed an amended petition requesting suspension to 8/24/04	Pending	
			Filed 4/12/04 for suspension until 6 months after the FCC acts to clarify various issues between wireless and rural wireline carriers 4/21/04 Staff Recommendation for 60-day interim suspension to investigate 5/11/04 Order approving Staff Recommendation		
GA	18718-U	Bulloch County Rural Telephone Chickamauga Telephone Citizens Telephone ComSouth Telecom GTC/GT COM Pineland Telephone Coop Plant Telephone Planters Telephone Coop Progressive Rural Telephone Public Service Telephone Ringgold Telephone	4/16/04 filed for suspension until 6 months after the courts and the FCC resolve the legal and operational issues that are raised by the Petitioners efforts to comply with directives contained in the 11/10/03 FCC Intermodal Order Staff proposed a 12/31/2004 implementation date. A 60-day status report, first one due June 30, will be utilized for enforcement Commissioners emphasized that 12/31 will be the absolute latest deadline 5/18/04 PSC granted extension to 12/31/04.	Granted	12/31/04
IA	SPU-04-3	Iowa Telecommunications Assoc Rural Iowa Independent Telephone Assoc (too many carriers to list individually)	On 2/18/04, filed petition for suspension of LNP requirements until costs come down or demand increases 03/04/04 Amended petition filed 4/9/04 4/23/04 IUB consolidated 04-3, 04-5, and 04-6 and granted interim waivers during investigation 5/11/04 IUB issued modified schedule Petitioner comments due 6/1/04, intervenor comments due 6/28/04, petitioner rebuttal due 7/14/04; Hearings held on 8/10/04	Pending	
IA	SPU-04-5	Alpine Communications Ayreshire Farmers Mutual Telephone Clear Lake Independent Telephone Cooperative Telephone Dumont Telephone Hills Telephone	Requesting interim suspension until six months after entry of a final order by IUB Requesting permanent suspension of any obligation to implement LNP until conditions warrant the expense 4/23/04 IUB consolidated 04-3, 04-5, and 04-6 and granted interim waivers during investigation 5/11/04 IUB issued modified schedule Petitioner comments due 6/1/04, intervenor comments due 6/28/04, petitioner rebuttal due 7/14/04, Hearings held on 8/10/04	Pending	

		Independent Networks Liberty Communications Lone Rock Cooperative Telephone Marne & Elk Horn Telephone Ringsted [Ringstead?] Telephone Royal Telephone Schaller Telephone Universal Communications of Allison Ventura Telephone Western Iowa Telephone			
IA	SPU-04-6	Coon Valley Cooperative Telephone Farmers Mutual Telephone Co Fenton Cooperative Telephone Co Modern Cooperative Telephone Co Northwest Tel. Co-op. Association Palmer Mutual Telephone Co River Valley Telephone Coop Terril Telephone Cooperative Tionka-Burt Communications Van Horne Coop Telephone Western Iowa Telephone	Requesting interim suspension until six months after entry of a final order by IUB Requesting permanent suspension of any obligation to implement LNP until conditions warrant the expense. Requesting suspension until companies' switches are replaced. 4/23/04 IUB consolidated 04-3, 04-5, and 04-6 and granted interim waivers during investigation--5/11/04 IUB issued modified schedule--Petitioner comments due 6/1/04, intervenor comments due 6/28/04, petitioner rebuttal due 7/14/04, Hearings held on 8/10/04	Pending	
IA	SPU-04-8	Iowa Telecom	3/24/04 filed for suspension until 12/31/04 for some switches and 5/24/04 for other switches 4/27/04 IUB granted interim waivers during investigation 5/11/04 IUB issued modified schedule. Petitioner comments due 6/1/04, intervenor comments due 6/28/04, petitioner rebuttal due 7/14/04, Hearings held on 8/10/04	Pending	
ID	GNR -T-04-1	Albion Telephone Cambridge Telephone Custer Telephone Coop Farmers Mutual Telephone Filer Mutual Telephone Midvale Telephone Mud Lake Telephone Coop Project Mutual Telephone Coop Direct Communications/Rockland Rural Telephone Silver Star Telephone Columbine Telephone Oregon-Idaho Utilities Rural Network Services CTC Telecom Fretel Comm. Fremont Telecom	Request for a 6-month extension beyond 5/24/04 03/26/04 Order issued granting 6- month suspension with progress reports due to PUC 7/23/04 and 9/24/04	Granted	
ID	INL-T-04-1	Inland Telephone Co	Request for suspension until 12/31/05. Staff recommends extension until 12/31/05 Suspension granted	Granted	12/31/05
IL	03-0726	Egyptian Telephone	Filed for extension 11/21/03 5/19/04 deadline for ICC action 4/16/04 Proposed Order granting suspension until 11/24/06 5/11/04 ICC granted extension to 11/24/06	Granted	11/24/06
IL	03-0730	Madison Telephone	Filed for extension 11/21/03 5/19/04 deadline for ICC action 4/16/04 Proposed	Granted	11/24/06

IL	03-0731	Harrisonville Telephone	Order granting suspension until 11/24/06 5/11/04 ICC granted extension to 11/24/06	Granted	11/24/06
IL	03-0732	Alhambra-Grandfork Telephone	Filed for extension 11/21/03 5/19/04 deadline for ICC action 4/16/04 Proposed Order granting suspension until 11/24/06 5/11/04 ICC granted extension to 11/24/06	Granted	11/24/06
IL	03-0733	Home Telephone	Filed for extension 11/21/03 5/19/04 deadline for ICC action 4/16/04 Proposed Order granting suspension until 11/24/06 5/11/04 ICC granted extension to 11/24/06	Granted	11/24/06
IL	04-0180	Gridley Telephone	Filed for extension 11/24/03 5/22/04 deadline for ICC action 4/16/04 Proposed Order granting suspension until 11/24/06 5/11/04 ICC granted extension to 11/24/06	Pending	
IL	04-0181	Flat Rock Telephone	3/1/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0182	Cambridge Telephone	3/1/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0183	Henry County Telephone	3/1/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0184	LaHarpe Telephone	3/2/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0185	Hamilton County Telephone	3/2/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0186	McDonough Telephone	3/2/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0189	Moultrie Telephone	3/3/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0192	Diverse Telephone	3/4/04, filed for extension until 11/24/06 Motion filed to consolidate 04-0192 & 04-0197 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0193	Glasford Telephone	3/4/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0194	Viola Telephone	3/4/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0195	New Windsor Telephone	3/4/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0196	Montrose Telephone	3/4/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0197	Woodhull Telephone	3/4/04, filed for extension until 11/24/06 Motion filed to consolidate 04-0192 & 04-0197 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0198	Leaf River Telephone	3/4/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0199	Oneida Telephone	3/4/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0200	Oneida Telephone	3/4/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0205	McNabb Telephone Company	3/5/04, filed for extension to 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0206	Reynolds Telephone Company	3/5/04, filed for extension to 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0228	Adams Telephone	3/8/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final	Pending	

			decision Next Hearing 6/7/04		
IL	04-0232	Cass Telephone	3/9/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0236	Shawnee Telephone	3/10/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0237	C-R Telephone	3/11/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04.	Pending	
IL	04-0238	El Paso Telephone	3/11/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0239	Odin Telephone	3/11/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0240	Yates City Telephone	3/11/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0243	Kinsman Telephone	3/11/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision-Next Hearing 6/7/04	Pending	
IL	04-0248	Stelle Telephone	3/12/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0249	Mid-Century Telephone	3/12/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0253	Wabash Telephone	3/12/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0259	Leonore Telephone	3/15/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04.	Pending	
IL	04-0282	Grandview Mutual Telephone Company	3/18/04, filed for extension to 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04	Pending	
IL	04-0283	Crossville Telephone Company	3/18/04, filed for extension until 11/24/06 5/11/04 Interim relief granted until final decision Next Hearing 6/7/04.	Pending	
IL	04-0300	Tomica Telephone	3/25/04, filed for extension 4/13/04 ICC granted request to dismiss	Closed	
IL	04-0365	Marsailles Telephone	4/30/04 Filed for interim suspension and unspecified longer term suspension 5/11/04 Interim relief granted until final decision	Pending	
IL	04-0366	Metamora Telephone	4/30/04 Filed for interim suspension and unspecified longer term suspension 5/11/04 Interim relief granted until final decision.	Pending	
IL	04-0367	Grafton Telephone	4/30/04 Filed for interim suspension and unspecified longer term suspension 5/11/04 Interim relief granted until final decision	Pending	
IN	42529/42536/42550	Citizens, Clay Co Rural Davies-Martin County RTC/RTC Comm RTC Communications Hancock Rural Telephone Mulberry Coop NITCO Perry-Spencer SEI Summan Washington Co Rural Yeoman/Century/Tel Craigville	Only companies that fall within one of the top 100 MSAs were granted temporary suspension pending review of the evidence of a technical hardship or May 24 th , 2004 5/18/04 IURC issued an order denying extensions for all carriers except that those carriers that were not, to date, LNP capable, could request from the IURC a 90-day extension to become LNP capable To date, only Hancock and Perry Spencer have responded that they are LNP capable through responses to data requests Carriers receiving the 90-day extension must file monthly progress reports	Denied	See Details

		<p>Monon New Lisbon Pulaski-White Smithville Telephone Swayzee Sweetser West Point</p> <p>TDS companies later petitioned to be included. Tri-County Home Telephone Company Home Telephone of Pitsboro Tipton Telephone Company Century Tel of Central Indiana (42536) Century Tel of Odon, Inc (42536) Clay County Rural Tel Coop (42529) Hancock Communications Inc (42529) Northwestern Indiana Tel Co (42529)</p>			
LA	Order U-27685	<p>CenturyTel of East Louisiana East Ascension Telephone Co Lafouche Telephone Co. Reserve Telephone Co Star Telephone Co</p>	Granted suspension until 5/24/2004 for service territories within the top 100 MSAs	Granted	5/24/04
MI	U13729	CenturyTel	Denied Request for Extension 12/8/03	Denied	
MI	U13958	Ogden Telephone	Denied Request for Extension 2/12/04	Denied	
MI	U13956	Waldron Telephone	Denied Request for Extension 2/12/04	Denied	
MN	P571/AM-04-328	Winnebago Coop	2/27/04 filed for extension Comments filed 4/8/04 Pending	Pending	
MN	P558, 6100/M-04-467	Red River Telephone`	3/24/04 filed for extension 4/30/04 Red River filed to withdraw petition	Withdraw	
MN	P404,573/AM-03-2015	Bridge Water Telephone Winsted Telephone	12/26/03 filed for extension 1/20/04 petition withdrawn 2/20/04 PUC Notice of Withdrawal	Withdraw	
MN	P533, 562/AM-04-655	Hills Telephone Sioux Valley Telephone	Filed 4/28/04 for suspension	Pending	
MN	04-707	Minnesota Independent Coalition (filing on behalf of 76 companies)	Petition filed 5/10/04 for suspension such that petitioners may to complete (1) negotiations with Qwest regarding agreement on two-way trunking, and (2) necessary operational changes to implement WLNTP Petitioners request PUC order Qwest to (1) limit the scope of the negotiations on the to the CMRS-routed transit function requested by the Petitioners, and (2) negotiate rates in good faith, on a non-discriminatory basis Petitioners state that negotiations may be able to complete by 7/30/04	Pending	
MO	CO-2004-0469	Chariton Valley Telecom	Filed 3/16/04 Staff recommends no suspension, but that Chariton not be liable for transport costs associated the ported numbers and that Chariton be allowed to block 7-digit dialed calls to ported numbers where facilities have not been arranged PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04.	Pending	
MO	IO-2004-0231	Cass County Telephone Company Citizens Telephone Co of Higginsville Missouri	On 1/22/04, carriers were granted a second temporary suspension to allow the PSC time for review of the petition until 2/23/04 2/20/04 PSC dismissed petition as moot	Dismissed	

		Green Hills Telephone Corporation KLM Telephone Company Lathrop Telephone Company			
MO	IO-2004-0453	Alma Telephone	Filed 3/3/04 for suspension until 5/24/06 4/15/04 Order denied Motion for expedited treatment PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	IO-2004-0467	Chariton Valley Telephone	Filed 3/15/04 Staff recommends no suspension, but that Chariton be allowed to block 7-digit dialed calls to ported numbers where facilities have not been arranged 4/14/04 Order denied Motion for expedited treatment Interim suspension granted to 8/7/04	Pending	
MO	IO-2004-0468	Northeast Missouri Rural Telephone	Filed 3/15/04 for suspension until 5/24/06 PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0370	New London Telephone Orchard Farm Telephone Stoutland Telephone	Filed 2/9/04 for suspension until 5/24/06 Staff recommended 6 mo suspension with need-for-more-detailed-info-from-carriers 4/29/04 Supplemental petition filed PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0401	KLM Telephone	Filed 2/17/04 for suspension until 5/24/06 PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0403	Holway Telephone	Filed 2/17/04 for suspension until 5/24/06 Staff recommended 2 yr suspension for Holway 4/26/04 supplemental petition filed PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0428	Green Hills Telephone	Filed 2/23/04 for suspension until 5/24/06 4/16/04 Order denied Motion for expedited treatment PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0437	Farber Telephone	Filed 2/26/04 for suspension until 5/24/06 PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0438	Peace Valley Telephone	Filed 2/26/04 for suspension until 5/24/06 4/15/04 Order denied Motion for expedited treatment PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0439	Rock Port Telephone	Filed 2/26/04 for suspension until 5/24/06 PSC scheduled on-the-record presentation 5/5/04 4/16/04 Order denied Motion for expedited treatment Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0454	Steelville Telephone Exchange	Filed 3/4/04 for suspension until 5/24/06 4/15/04 Order denied Motion for expedited treatment PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0455	Mid-Missouri Telephone	Filed 3/4/04 for suspension until 5/24/06 4/15/04 Order denied Motion for expedited treatment PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0456	Grand River Mutual Telephone	Filed 3/5/04 for suspension until 5/24/06 4/15/04 Order denied Motion for expedited treatment PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0457	Lathrop Telephone	Filed 3/5/04 for suspension until 5/24/06 4/15/04 Order denied Motion for expedited treatment PSC heard on-the-record presentation 5/5/04 PSC will review	Pending	

			information presented and issue an order Interim suspension granted to 8/7/04		
MO	TO-2004-0458	Mark Twain Rural Telephone	Filed 3/5/04 for suspension until 5/24/06 4/15/04 Order denied Motion for expedited treatment PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0459	Iamo Telephone	Filed 3/8/04 for suspension until 5/24/06 PSC scheduled on-the-record presentation 5/5/04 4/16/04 Order denied Motion for expedited treatment Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0480	Ellington Telephone	Filed 3/19/04 PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0484	BPS Telephone	Filed 3/22/04 PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0486	Citizens Telephone of Higginsville	Filed 3/24/04 for suspension until 5/24/06 4/14/04 Order denied Motion for expedited treatment PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0487	Kingdom Telephone	Filed 3/24/04-4/2/04-Staff recommends no suspension, but that Kingdom not be liable for transport costs associated the ported numbers and that Kingdom be allowed to block 7-digit dialed calls to ported numbers where facilities have not been arranged PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0489	Fidelity Telephone	Filed 3/25/04 4/2/04 Staff recommends no suspension, but that Fidelity not be liable for transport costs associated the ported numbers and that Fidelity be allowed to block 7-digit dialed calls to ported numbers where facilities have not been arranged PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0490	Goodman Telephone Ozark Telephone Seneca Telephone	Staff recommends no suspension, but that Petitioners not be liable for transport costs associated the ported numbers and that Petitioners be allowed to block 7-digit dialed calls to ported numbers where facilities have not been arranged. 4/15/04 Order denied Motion for expedited treatment PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0491	McDonald County Telephone	Staff recommends no suspension, but that McDonald not be liable for transport costs associated the ported numbers and that McDonald be allowed to block 7-digit dialed calls to ported numbers where facilities have not been arranged PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0493	Granby Telephone	Filed 3/29/04 Staff recommends no suspension, but that Granby not be liable for transport costs associated the ported numbers and that Granby be allowed to block 7-digit dialed calls to ported numbers where facilities have not been arranged 4/15/04 Order denied Motion for expedited treatment PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0494	Le-Ru Telephone	Filed 3/31/04 Staff recommends no suspension, but that Le-Ru not be liable for transport costs associated the ported numbers and that Le-Ru be allowed to block 7-digit dialed calls to ported numbers where facilities have not been arranged 4/15/04 Order denied Motion for expedited treatment PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	

MO	TO-2004-0503	New Florence Telephone	Filed 4/5/04 Staff recommends suspension until 5/24/06 4/15/04 Order denied Motion for expedited treatment PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0504	Cass County Telephone	Filed 4/5/04 Staff recommends no suspension, but that Cass not be liable for transport costs associated the ported numbers and that Cass be allowed to block 7-digit dialed calls to ported numbers where facilities have not been arranged 4/15/04 Order denied Motion for expedited treatment PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0505	Craw-Kan Telephone	Filed 4/6/04 Staff recommends no suspension, but that Craw-Kan not be liable for transport costs associated the ported numbers and that Craw-Kan be allowed to block 7-digit dialed calls to ported numbers where facilities have not been arranged 4/14/04 Order denied Motion for expedited treatment PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0511	Miller County Telephone	Filed 4/7/04 Staff recommends suspension until 12/31/04, and that Miller not be liable for transport costs associated the ported numbers and that Miller be allowed to block 7-digit dialed calls to ported numbers where facilities have not been arranged 4/14/04 Order denied Motion for expedited treatment PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	TO-2004-0526	Oregon Farmers Mutual	Filed 4/13/04 for two-year suspension 4/19/04 Order denied Motion for expedited treatment PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	IO-2004-0546	Choctaw Telephone	Filed 4/20/04 Choctaw is working to be LNP capable by 5/24/04 PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MO	IO-2004-0545	MoKan Telephone	Filed 4/20/04 PSC heard on-the-record presentation 5/5/04 PSC will review information presented and issue an order Interim suspension granted to 8/7/04	Pending	
MS	03-UA-0918	Bay Springs Telephone BPM Noxapater Telephone Bruce Telephone Calhoun City Telephone CenturyTel of North MS Decatur Telephone Delta Telephone Franklin Telephone Frontier Comm of Mississippi Fulton Telephone Georgetown Telephone Lakeside Telephone Mound Bayou Telephone Myrtle Telephone Sledge Telephone Smithville Telephone Southeast Mississippi Telephone	12/12/03 filed for extension until network and operational can be thoughtfully addressed 4/16/04 filed amended petition with detailed cost information Was not acted on at 5/4/04 agenda Next agenda is 6/1/04	Pending	

MT	D2004 3 35	Ronan Telephone Hot Springs Telephone	3/10/04 filed request for immediate suspension Work session for Commission action 4/6/04 Order number 6554 Interim suspension granted Consolidated into D2004 3 39 Case Closed	Closed	
MT	D2004 3 37	MT Independent Telecom Systems/MT Telecom Assoc	3/11/04 filed request for immediate suspension Work session for Commission action 4/6/04 Order number 6553 Interim suspension granted Consolidated into D2004 3 39 Case Closed	Closed	
MT	D2004 3 39	MT Telecom Assoc	3/11/04 filed request for long-term suspension Petitioner Testimony due 5/28/04, Intervenor testimony due 6/22/04, All reply testimony due 7/14/04, Hearings 9/8-9/04 Parties stipulated to extend 180-day action deadline by 60 days to 11/8/04	Pending	
MT	D2004 3 44	MT Independent Telecom Systems	3/16/04 filed request for long-term suspension Work session for Commission action 3/29/04 Consolidated into D2004 3 39 Case Closed	Closed	
NC	P100, Sub 133r	LEXCOM Telephone Co Randolph Telephone Co Pineville Telephone	On 1/12/04, UTC granted 90-day suspension from 1/12/04 Following 90 days all other requests for LNP would have to be met 3/1/04 LexCom filed notice that they are LNP compliant	Closed	
ND	PU-04-138	Red River Telephone Assoc/Red River Telecom	3/4/04 Filed for LNP suspension--4/14/04 PU/C dismissed petition for lack of jurisdiction under state law	Closed	
NE	C-3096	Great Plains Communications, Inc	Filed 01/27/04 Requesting suspension of LNP date Interim Relief Granted 3/3/04 until date TBD later Discovery Requests from Sprint to Great Plains filed 4/5/04 Hearings set for 6/2-4/04	See Details	TBD
NE	C-3110	Clarks Telecommunications Co.	Filed 02/13/04 Requesting suspension of LNP date Interim Relief Granted 3/23/04 until date TBD later For C-3110 - C-3122, 3/30/04 Planning Conf Order set discovery and testimony deadlines, hearings set for 6/2-4/04	See Details	TBD
NE	C-3111	Consolidated Telephone Co /Consolidated Telco/Consolidated Telecom	Filed 02/13/04 Requesting suspension of LNP date Interim Relief Granted 3/23/04 until date TBD later For C-3110 - C-3122, 3/30/04 Planning Conf Order set discovery and testimony deadlines, hearings set for 6/2-4/04	See Details	TBD
NE	C-3112	Hamilton Telephone Company	Filed 02/13/04 Requesting suspension of LNP date Interim Relief Granted 3/23/04 until date TBD later For C-3110 - C-3122, 3/30/04 Planning Conf Order set discovery and testimony deadlines, hearings set for 6/2-4/04	See Details	TBD
NE	C-3113	Hartington Telecommunications Co	Filed 02/13/04 Requesting suspension of LNP date Interim Relief Granted 3/23/04 until date TBD later For C-3110 - C-3122, 3/30/04 Planning Conf Order set discovery and testimony deadlines, hearings set for 6/2-4/04	See Details	TBD
NE	C-3114	Hershey Cooperative Telephone Co	Filed 02/13/04 Requesting suspension of LNP date Interim Relief Granted 3/23/04 until date TBD later For C-3110 - C-3122, 3/30/04 Planning Conf Order set discovery and testimony deadlines, hearings set for 6/2-4/04	See Details	TBD
NE	C-3115	K & M Telephone Company, Inc	Filed 02/13/04 Requesting suspension of LNP date Interim Relief Granted 3/23/04 until date TBD later For C-3110 - C-3122, 3/30/04 Planning Conf Order set discovery and testimony deadlines, hearings set for 6/2-4/04	See Details	TBD
NE	C-3116	Nebraska Central Telephone	Filed 02/13/04 Requesting suspension of LNP date Interim Relief Granted 3/23/04 until date TBD later For C-3110 - C-3122, 3/30/04 Planning Conf Order set discovery and testimony deadlines, hearings set for 6/2-4/04	See Details	TBD
NE	C-3117	Northeast Nebraska Telephone	Filed 02/13/04 Requesting suspension of LNP date Interim Relief Granted 3/23/04 until date TBD later For C-3110 - C-3122, 3/30/04 Planning Conf Order set discovery and testimony deadlines, hearings set for 6/2-4/04	See Details	TBD
NE	C-3118	Sodtoun Telephone Company	Filed 02/13/04 Requesting suspension of LNP date Interim Relief Granted 3/23/04 until date TBD later For C-3110 - C-3122, 3/30/04 Planning Conf Order set discovery and testimony deadlines, hearings set for 6/2-4/04	See Details	TBD

NE	C-3119	Stanton Telecom, Inc	Filed 02/13/04 Requesting suspension of LNP date Interim Relief Granted 3/23/04 until date TBD later For C-3110 – C-3122, 3/30/04 Planning Conf Order set discovery and testimony deadlines, hearings set for 6/2-4/04	See Details	TBD
NE	C-3120	Three River Telco	Filed 02/13/04 Requesting suspension of LNP date Interim Relief Granted 3/23/04 until date TBD later For C-3110 – C-3122, 3/30/04 Planning Conf Order set discovery and testimony deadlines, hearings set for 6/2-4/04	See Details	TBD
NE	C-3121	Eastern Nebraska Telephone	Filed 02/17/04 Requesting suspension of LNP date Interim Relief Granted 3/23/04 until date TBD later For C-3110 – C-3122, 3/30/04 Planning Conf Order set discovery and testimony deadlines, hearings set for 6/2-4/04	See Details	TBD
NE	C-3122	Rock County Telephone	Filed 02/17/04 Requesting suspension of LNP date Interim Relief Granted 3/23/04 until date TBD later For C-3110 – C-3122, 3/30/04 Planning Conf Order set discovery and testimony deadlines, hearings set for 6/2-4/04	See Details	TBD
NE	C-3128	Hemingford Coop	Filed 02/18/04 Requesting suspension of LNP date Interim Relief Granted 3/30/04 until date TBD later For C-3110 – C-3122, 3/30/04 Planning Conf Order set discovery and testimony deadlines, hearings set for 6/2-4/04	See Details	TBD
NE	C-3132	Araphoe Telephone	Filed 02/25/04 Requesting suspension of LNP date Interim Relief Granted 3/30/04 until date TBD later	See Details	TBD
NE	C-3133	Benkelman Telephone	Filed 02/25/04 Requesting suspension of LNP date Interim Relief Granted 3/30/04 until date TBD later	See Details	TBD
NE	C-3134	Cozad Telephone	Filed 02/25/04 Requesting suspension of LNP date Interim Relief Granted 3/30/04 until date TBD later	See Details	TBD
NE	C-3135	Curtis Telephone	Filed 02/25/04 Requesting suspension of LNP date Interim Relief Granted 3/30/04 until date TBD later	See Details	TBD
NE	C-3136	Diller Telephone	Filed 02/25/04 Requesting suspension of LNP date Interim Relief Granted 3/30/04 until date TBD later	See Details	TBD
NE	C-3137	Glenwood Telephone	Filed 02/25/04 Requesting suspension of LNP date Interim Relief Granted 3/30/04 until date TBD later	See Details	TBD
NE	C-3138	Hartman Telephone	Filed 02/25/04 Requesting suspension of LNP date Interim Relief Granted 3/30/04 until date TBD later	See Details	TBD
NE	C-3139	Keystone Arthur Telephone	Filed 02/25/04 Requesting suspension of LNP date Interim Relief Granted 3/30/04 until date TBD later	See Details	TBD
NE	C-3140	Mannstay Comm/Henderson Coop	Filed 02/25/04 Requesting suspension of LNP date Interim Relief Granted 3/30/04 until date TBD later	See Details	TBD
NE	C-3141	Plainview Telephone	Filed 02/25/04 Requesting suspension of LNP date Interim Relief Granted 3/30/04 until date TBD later	See Details	TBD
NE	C-3142	Southeast Nebraska Telephone	Filed 02/25/04 Requesting suspension of LNP date Interim Relief Granted 3/30/04 until date TBD later	See Details	TBD
NE	C-3143	Wauneta Telephone	Filed 02/25/04 Requesting suspension of LNP date Interim Relief Granted 3/30/04 until date TBD later	See Details	TBD
NE	C-3146	Pierce Telephone	Filed 02/27/04 Requesting suspension of LNP date Interim Relief Granted 3/30/04 until date TBD later	See Details	TBD
NE	C-3147	Hooper Telephone/WesTel Systems	Filed 02/27/04 Requesting suspension of LNP date Interim Relief Granted 3/30/04 until date TBD later	See Details	TBD
NE	C-3153	Dalton Telephone	Filed 03/09/04 Requesting suspension of LNP date Interim Relief Granted 4/14/04	See	TBD

			until date TBD later	Details	
NE	C-3154	Elise Comm	Filed 03/09/04 Requesting suspension of LNP date Interim Relief Granted 4/14/04 until date TBD later	See Details	TBD
NE	C-3207	Cambridge telephone	Filed 04/18/04 Requesting suspension of LNP date Interim Relief Granted 4/18/04 until date TBD later	See Details	TBD
NV	04-4032	Moapa Valley Telephone Company	Filed 4/27/04 requesting waiver of LNP date until 8/24/04 Comments due 5/19/04	Pending	
NM	04-00017-UT	Baca Valley Telephone Co Century Tel of the Southwest Navajo Communications Co Dell telephone Coop ENMR Telephone Coop La Jicarilla Rural Telephone Coop Penasco Valley Telephone Coop Roosevelt County Rural Telephone Tularosa Basin Telephone Co	Filed 1/15/04 Intervenor testimony due 3/22/04 Staff testimony due 3/26/04 Rebuttal testimony due 4/1/04 Hearings set for 4/6/04 Staff recommends suspension of LNP for one year for all carriers but Valor Staff recommends no extension for Valor Pending	Pending	
		VALOR Telecommunications of Texas Valley Telephone Coop Western New Mexico Telephone Co LEACO			
NM	04-00043-UT	Mescalero Apache Telecom	04/20/04 Separate docket opened for Mescalero Apache Telecom	Pending	
NY	03-C-1508	Armstrong Telephone Company - New York Berkshire Telephone Corporation Cassadaga Telephone Corporation Champlain Telephone Company Chautauqua and Erie Telephone Chazy and Westport Telephone Crown Point Telephone Dunkirk and Fredonia Telephone Empire Telephone Corp Germantown Telephone Co, Inc Hancock Telephone Co Margaretville Telephone Company Oneida County Rural Telephone Pattersonville Telephone Company State Telephone Company Taconic Telephone Corp The Middleburgh Telephone Company Trumansburg Telephone Company Warwick Valley Telephone Company	Carrier petition seeks 6 month extension beyond the date the FCC clarifies wireless to wireline porting rules 4/19/04 final order released Petition denied Carriers must implement by 5/24/04	Denied	
OH			Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
OH	04-0428-TP-UNC	Minford Telephone			
OH	04-0429-TP-UNC	Kalida Telephone	Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions	Pending	

			are met 5/5/04 carriers filed cost information		
OH			Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered; 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
	04-0430-TP-UNC	Wabash Mutual Telephone			
OH			Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
	04-0431-TP-UNC	Ottoville Mutual Telephone			
OH			Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met 5/5/04 carriers filed cost information—5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
	04-0432-TP-UNC	Sycamore Telephone			
OH			Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
	04-0433-TP-UNC	Germanatown Independent Telephone			
OH			Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
	04-0434-TP-UNC	Arthur Mutual Telephone			
OH			Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
	04-0435-TP-UNC	Vaughnsville Telephone			
OH			Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
	04-0436-TP-UNC	McClure Telephone			
OH			Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
	04-0437-TP-UNC	New Knoxville Telephone			
OH			Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are	Pending	

			considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers		
OH	04-0438-TP-UNC	Nova Telephone	Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
OH	04-0439-TP-UNC	Sherwood Mutual Telephone	Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
OH	04-0440-TP-UNC	Glandorf Telephone	Filed 3/31/04 suspension-of-6-mos-after-order-and-permanent-until-certain-conditions are met 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
OH	04-0441-TP-UNC	Bascom Mutual Telephone	Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
OH	04-0442-TP-UNC	Ayersville Telephone	Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
OH	04-0443-TP-UNC	Middlepoint Home Telephone	Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
OH	04-0444-TP-UNC	Fort Jennings Telephone	Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
OH	04-0445-TP-UNC	Benton Ridge Telephone	Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to	Pending	

OH			review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
OH	04-0446-TP-UNC	Ridgeville Telephone	Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met. 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers		
OH			Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met. Carriers ordered to file cost information by 5/5/04 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
OH	04-0447-TP-UNC	Doylestown Telephone	Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met. Carriers ordered to file cost information by 5/5/04 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers		
OH			Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met. 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
	04-0448-TP-UNC	Buckland Telephone	Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met. 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers		
OH			Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met. 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
OH	04-0449-TP-UNC	Farmers Mutual Telephone	Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met. 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers		
OH			Filed 3/31/04 suspension of 6 mos after order and permanent until certain conditions are met. 5/5/04 carriers filed cost information 5/19/04 PUC issued order 1) finding petitioner failed to prove technical infeasibility, 2) finding PUC required more time to review financial constraints, 3) granting 90-day interim waiver while costs are considered, 4) granting interventions of wireless carriers, and 4) requiring petitioners to have capability to query and route for calls to ported numbers	Pending	
OH	03-1970-TP-UNC	Orwell	Petition withdrawn	Withdraw	
OH	03-1972-TP-UNC	Vaughnsville	Request for suspension granted When company receives another request for LNP	Granted	See details
OH	03-2308-TP-UNC	CenturyTel	Petition withdrawn	Withdraw	
OK	200300603	Atlas Telephone Company Bixby Telephone Company Cimarron Telephone Company McCloud Telephone Company Pioneer Telephone Cooperative	Bixby Telephone Company, Cimarron Telephone Company, McCloud Telephone Company and Pioneer Telephone Cooperative granted extensions to implement wireline to wireless LNP until 05/24/04	Granted	5/24/04
OK	200400074	Oklahoma Communication Systems	5/18/04 OCC granted suspension to 11/24/04 If OCSI has delays in getting equipment, they should file for a further extension	Granted	11/24/04
OK	200400089	Valor Telecom	5/18/04 OCC granted suspension to 11/24/04.	Granted	11/24/04
OR	UM 1114	Oregon Telecommunications Assoc	Motion to withdraw petition granted 12/17/04	Withdraw	
OR	UM 1125	Helix Telephone	PUC Granted extension to 10/1/04 for Helix Exchange, and 6/1/07 for Meacham exchange	Granted	10/1/04 6/1/07
OR	UM 1139	Monitor Coop	Filed 3/22/04 5/14/04 Staff report filed for 5/18 PUC agenda Staff recommends suspension until 12/31/04	Pending	
OR	UM 1141	Pine Telephone Systems	Filed 4/14/04 4/26/04 filed amended petition requesting a 90-day waiver for Pine's wire centers other than Granite Staff report filed for 5/18 PUC agenda Staff recommends suspension until 3/1/05 for Granite exchange and 8/22/04 for Halfway exchange	Pending	

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OR	UM 1146	St Paul Cooperative Telephone	Filed 4/23/04 for suspension until 12/07	Pending	
OR	UM 1149	Eagle Telephone	Filed 4/29/04 for 6 month waiver.	Pending	
PA	P-00032068	Rural Company Coalition	Rural Company Coalition filed petition to withdraw 5/7/04 PUC Granted petition to withdraw	Withdraw	
SC	2003-0335-C	Bluffton Telephone Chesnee Telephone Chester Telephone Farmers Telephone Coop Ft Mill Telephone/Comporium Comm FTC Diversified Services Hargray Telephone Home Telephone Horry Telephone HTC Communications Lancaster Telephone/Comporium Comm Lockhart Telephone McClellanville Telephone Norway Telephone Palmetto Rural Telephone Coop Piedmont Rural Telephone Coop PBT Communications PBT Telecom PRTCommunications Ridgeway Telephone Rock Hill Telephone/Comporium Comm Sandhill Telephone Coop St Stephen Telephone West Carolina Comm West Carolina Rural Telephone Williston Telephone Company	11/10/03 filed for extension 11/21/03 PSC granted interim 180-day extension Hearings on 4/19/04 Pending	Pending	
SD	TC04-025	Kennebec Telephone	Petition filed 02/12/04 Suspension of 6 mos after order and permanent until certain conditions are met. 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 Intervenor & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
SD	TC04-038	Santel Comm	Filed 02/25/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 Intervenor & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
SD	TC04-044	Sioux Valley Telephone	Petition filed 03/09/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 Intervenor & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
SD	TC04-045	Golden West Telecommunications Coop Vivian Telephone	Petition filed 3/9/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision	Pending	

		Kadoka Telephone	Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 intervenors & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04		
SD	TC04-046	Armour Independent Telephone Bridgewater Independent Telephone Union Telephone	Petition Filed 3/9/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 intervenors & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
SD	TC04-047	Brookings Municipal Utilities DBA Swiftel Comm	Petition Filed 3/11/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 intervenors & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
SD	TC04-048	Beresford Municipal Telephone	Petition Filed 3/11/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
SD	TC04-049	McCook Cooperative Telephone	Date Filed 3/12/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 intervenors & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
SD	TC04-050	Valley Telecommunications Coop Assoc	Filed 03/11/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 intervenors & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
SD	TC04-051	Faith Municipal Telephone	Filed 03/12/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 intervenors & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
SD	TC04-052	Midstate Comm	Date Filed 3/12/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 intervenors & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
SD	TC04-053	Western Telephone	Date Filed 3/12/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 intervenors & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
SD	TC04-054	Interstate Telecommunications Coop	Date Filed 3/15/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 intervenors & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	

SD	TC04-055	Alliance Communications Coop Splitrock Properties	testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
			Date Filed 3/15/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 Intervenor & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04		
SD	TC04-056	RC Comm Roberts County Telephone Coop	Date Filed 3/15/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 Intervenor & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
			Date Filed 3/17/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 Intervenor & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04		
SD	TC04-060	Venture Communications Coop	Date Filed 3/17/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 Intervenor & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
			Date Filed 3/17/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 Intervenor & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04		
SD	TC04-061	West River Cooperative Telephone Company	Date Filed 3/17/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 Intervenor & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
			Date Filed 3/17/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 Intervenor & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04		
SD	TC04-062	Stockholm-Strandburg Telephone	Date Filed 3/17/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 Intervenor & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
			Date Filed 3/17/04 Suspension of 6 mos after order and permanent until certain conditions are met 4/19/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 Intervenor & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04		
SD	TC-04-077	James Valley Coop	Filed 4/14/04 Suspension of 6 mos after order and permanent until certain conditions are met PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 Intervenor & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
			Filed 4/23/04 for suspension of 6 mos after order and permanent until certain conditions are met 5/11/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 Intervenor & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04		
SD	TC-04-084	Tri-county Telecom	Filed 4/23/04 for suspension of 6 mos after order and permanent until certain conditions are met 5/11/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 Intervenor & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
			Filed 4/23/04 for suspension of 6 mos after order and permanent until certain conditions are met 5/11/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 Intervenor & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04		
SD	TC-04-085	Cheyenne River Sioux Tribe Telephone	Filed 4/23/04 for suspension of 6 mos after order and permanent until certain conditions are met 5/11/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 Intervenor & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04	Pending	
			Filed 4/23/04 for suspension of 6 mos after order and permanent until certain conditions are met 5/11/04 PUC granted interim suspension pending final decision Procedural schedule set 5/14/04 testimony & exhibits for petitioners, 5/28/04 Intervenor & Staff Reply testimony & exhibits, 6/14/04 Petitioners rebuttal testimony, hearings 6/22/04 - 6/25/04 & 6/28/04 - 7/2/04		
TN	Docket 03-00633	Ardmore Telephone Ben Lomand Rural Telephone Coop Bledsoe Telephone Coop CenturyTel of Adamsville CenturyTel of Claiborne (Withdrawn) CenturyTel of Ooltewah-Collegedale	Requested suspension without end date Comments filed 02/04 3/24/04 Coalition filed amended petition with company-specific information requesting suspension until the later of (1) the dates each Petitioner has listed as their projected date for LNP capability, (2) six months after the date the FCC Intermodal Orders (11/10/03 and 1/16/04) are no longer subject to appeal, and (3) 6 months after the date the TRA has provided direction to the Petitioners on the rating and routing issues in this Petition	Pending	

		<p>Crockett Telephone Dekalb Telephone Coop Highland Telephone Coop Humphreys County Telephone Loretto Telephone Millington Telephone North Central Telephone Coop Peoples Telephone Tollco Telephone Tennessee Telephone Twin Lakes Telephone Coop United Telephone West Tennessee Telephone Yorkville Telephone Coop</p>	<p>and the CMRS Arbitration (Docket No. 03-00585) 5/11/04 TRA granted interim relief until 7/23/04. Also Granted intervention. Direct testimony due 6/4/04 Rebuttal testimony due 6/11/04 Next hearing after 6/18/04 Final decision to be reached before 7/23/04.</p>		
TX	28723	Brazos Telecommunications	Dismissed	See	
	(consolidated)	<p>Brazos Telephone Coop CenturyTel of San Marcos CenturyTel of Lake Dallas Colorado Valley Telephone Coop Comanche County Telephone Company Cumby Telephone Coop Eastex Telephone Coop ENMR TelePhone Coop Five Area Telephone Coop Fort Bend Telephone Company Lipan Telephone Company Livingston Telephone Mid-Plains Rural Telephone Coop Muenster d/b/a Nortex Communications Nortex Telecom LLC Peoples Telephone Coop Personal Touch Santa Rosa Telephone Coop South Plains Telephone Coop TXU Communications W T Services West Plains Telecommunications West Texas Rural Telephone Coop Wes-Tex Telephone Coop Wes-Tex d/b/a Westex Telecom XIT Rural Telephone Coop XIT Telecommunication & Technology</p>	<p>Brazos Telecommunications Brazos Telephone Coop Colorado Valley Telephone Coop Comanche County Telephone Company ENMR Telephone Coop Five Area Telephone Coop Lipan Telephone Company Livingston Telephone Company Mid-Plains Rural Telephone Coop Nortex Telecom LLC Santa Rosa Telephone South Plains Telephone W T Services West Texas Rural Telephone Coop Wes-Tex d/b/a Westex Telecom Wes-Tex Telephone Coop XIT Rural Telephone Coop XIT Telecommunication & Technology</p>	Details	
		<p><u>5/10/04 PUC Issued Proposed Final Order Suspending Obligations until 5/24/04</u> CenturyTel of San Marcos CenturyTel of Lake Dallas Cumby Telephone Coop Eastex Telephone Coop Muenster d/b/a Nortex Communications Nortex Telecom LLC Peoples Telephone Coop Personal Touch</p>			
		<p><u>5/10/04 PUC Issued Proposed Final Order Suspending Obligations until 9/30/04</u> Fort Bend Telephone TXU Communications</p>			

			For TXU and Fort Bend, parties agree to extend W/LNP implementation deadline to 9/30/04 subject to agreement that if either receives BFR from end user customer to port number to a wireless carrier, as evidenced by letter of authorization from customer's wireless carrier, request will be implemented TXU and/or Fort Bend may be unable to bill the end user charges associated with such a port between 5/24-9/30/04, but will forego any end user billing that cannot be billed during that period		
TX	29278 (consolidated)	Five Area Telephone Coop Kerrville Telephone Company Wes-Tex Telecommunications Wes-Tex Telephone Coop, West Plains Telecommunications Brazos Telecommunications (withdraw) Brazos Telephone Coop (withdraw) Livingston Telephone (withdraw) North Texas Telephone Coop TXU Communications Telephone Valor Telecommunications	4/2/04 Brazos Telecom petition to withdraw from 29278 filed 4/2 02/03/04 petitions filed for temporary suspension until 07/31/04 North Texas Telephone Co requested a suspension until 11/01/04 Brazos Telecom, Brazos Telephone Coop, & Livingston Telephone Company seek suspension of intermodal LNP until the FCC resolves issues related to inter-carrier compensation, and questions posed in FNPRM in the FCC's Intermodal Order Direct Test due 4/26/04 Reb Test due 5/4/04 Hearings 5/11/04 3/4/04 Kerrville & Valor added to this docket Both seeking suspension until 3/15/05 3/31/04 Livingston filed to withdraw its petition 4/23/04 PUC dismissed petition 4/2/04 Brazos filed to withdraw its petition 4/23/04 PUC dismissed petition 4/30/04 Settlement reached for new implementation dates Five Area Telephone Coop 7/31/04 Wes-Tex Telecommunications 7/31/04 Wes-Tex Telephone Coop 7/31/04 West Plains Telecommunications 7/31/04 North Texas Telephone Coop 11/1/04 Valor & Kerrville 4/30/04 Staff recommends denial of Val,or and Kerrville petitions along with monthly status reports until they implement LNP which they should do ASAP 5/19/04 Joint Recommended Order requires implementation by 7/24/04, 9/24/04, or 11/24/04 based on a schedule attached to the proposed order PUC Deadline to act 7/28/04	See Details	
TX	29523	Border To Border Communications	Filed 3/29/04 for suspension to 3/31/05 and temporary suspension pending decision 4/20/04 Staff recommends procedural schedule and grant of interim suspension 4/23/04 Staff recommendation adopted 5/14/04 Staff requests extension to file next recommendation by 5/20/04 Deadline for Decision 9/25/04	Pending	
TX	29569	Coleman County Telephone Cooperative	Filed 4/7/04 for suspension to 6/31/05 and temporary suspension pending decision 4/20/04 Staff recommends procedural schedule, grant of interim suspension, and consolidation w/ Border to Border proceeding 4/23/04 Staff recommendation adopted 5/14/04 Staff requests extension to file next recommendation by 5/20/04 Deadline for Decision 10/4/04	Pending	
UT	04-2424-01	All West Comm Bear Lake Comm Beehive Telephone Co Carbon/Emery Telecom	Filed 2/24/04 for LNP Waivers 3/17/04 PSC granted waivers until 5/24/05 or further PSC Order Carriers must file implementation update reports by 9/1/04	Granted	5/24/05

		Central Utah Telephone Citizens Telecom/Frontier Comm Emery Telecom Gunnison Telephone Hanksville Telecom Manti Telephone Co Navajo Comm Skyline Telecom Utah Basin Telecom Assoc UBET Telecom Union Telephone			
VA	PUC-2004-00027	Peoples Mutual Telephone	Filed 3/4/04 for a 12 month suspension Reply comments filed 4/26/04 5/3/04 SCC Staff filed comments stating that SCC had jurisdiction to rule on this petition	Pending	
WA	UT-031915	CenturyTel	Denied request for extension on 12/18/03	Denied	
WA	UT-031934	YCOM	Denied request for extension on 12/18/03	Denied	
WA	UT-031822	Inland	Suspensions granted until 06/30/04 in Roslyn, 12/31/04 in Dewatto, 6/30/05 in Prescott, and 12/31/05 in Unontown Waiver granted	Granted	6/30/04 12/31/04 6/30/05 12/31/05
WA	UT-031935	Ellensburg Telephone Company	Petition Withdrawn	Withdraw	
WA	UT-032085	Asotin	Requesting suspension until 6/1/06 3/24/04 suspension to 6/1/06 granted	Granted	6/1/06
WA	UT-031534	Rainier Connect, Inc Local Access Prime	Staff recommended denial of suspension request Carriers requested to withdraw petition Case closed	Withdraw	
WA	UT-031535	Asotin Telephone Company CenturyTel of Cowiche, Inc CenturyTel of Inter Island, Inc CenturyTel of Washington, Inc Ellensburg Telephone Company Har Island Telephone Company Hood Canal Telephone Company Inland Telephone Company Kalama Telephone Company Lewis River Telephone Company Mashell Telecom, Inc McDaniel Telephone Company Pend Oreille Telephone Company Tennno Telephone Company The Toledo Telephone Co Whidbey Telephone Company YCOM Networks, Inc	Staff recommended denial of petition for all but Asotin and Inland Case Closed	See details	
WA	UT-040676	Pioneer Telephone	Request for suspension until 12/31/04 Granted 5/12/04	Granted	12/31/04
WI	05-TN-102	Amery Telecom Amherst Telephone Baldwin Telephone Coop Bayland Telephone (Withdrawn) Bloomer Telephone (Withdrawn) CenturyTel of the MW Wisconsin	Filed for suspension on 11/25/03 Request for comments to be filed by 1/9/04 PSC Issued Order Grant in part with new dates Amery Telecom	See Details	See Details

	(Withdrawn) CenturyTel of the NW Wisconsin (Withdrawn) Chequamegon Communications Cochrane Coop Telephone Coon Valley Farmers Telephone Hager Telecom Indianhead Telephone (withdrawn) La Valle Telephone Manawa Telephone Marquette Adams Telephone (withdrawn) Mosinee Telephone (withdrawn) Nelson Telephone Richland-Grant Telephone Coop State Long Distance Telephone Telephone USA of Wisconsin (withdrawn) Tri-County Telephone Wood County Telephone (withdrawn) West Wisconsin Telcom	Coon Valley Telephone Co Cochrane Cooperative Hager Telecom Manawa Telephone Company State Long Distance Tel Co West Wisconsin Telephone Coop La Valle Telephone Coop (all) Grant the request Amherst Telephone Company Denial justified but given 45 days for final implementation or filings at the FCC Chequamegon Communications Coop Nelson Telephone Coop Richland-Grant Coop Tri-County Telephone Cooperative	11/24/2005 8/24/2004 8/24/2004 8/24/2004 8/24/2004 8/24/2004 8/24/2004 11/24/04 7/8/04 7/8/04 7/8/04 7/8/04		
WI	05-TN-103 Black Earth Telephone Grantland Telecom Tenney Telephone	2/12/04 filed for suspension until 2/24/04	Comments due 4/1/04	Pending	
WV	03-1749-T-PC Armstrong Telephone Company-Northern Division	Company and Staff stipulated on agreed suspension from 4/20/04 to 4/20/05 or until 6 months after the FCC acts to clarify various issues between wireless and rural wireline carriers 3/8/04 No exceptions filed to recommendation Petition resolved		Granted	4/20/05
WY	70013-TA-03-18 All West Communications	Filed request 12/12/03 for indefinite waiver	Comments, interventions due 3/31/04	Pending	
WY	70005-TA-03-20 Chugwater Telephone	Filed request 12/12/03 for indefinite waiver	Comments, interventions due 3/31/04	Pending	
WY	70012-TA-03-22 Project Telephone	Filed request 12/12/03 for indefinite waiver	Comments, interventions due 3/31/04	Pending	
WY	70016-TA-03-27 Columbine Telephone/Teton Telecom	Filed request 12/12/03 for indefinite waiver	Comments, interventions due 3/31/04	Pending	
WY	70007-TA-03-42 Dubois Telephone	Filed request 12/12/03 for indefinite waiver	Comments, interventions due 3/31/04	Pending	
WY	70015-TA-03-43 RT Communications	Filed request 12/12/03 for indefinite waiver	Comments, interventions due 3/31/04	Pending	
WY	70001-TA-03-50 Range Telephone	Filed request 12/12/03 for indefinite waiver	Comments, interventions due 3/31/04	Pending	
WY	70006-TA-03-63 Silver Star Communications	Filed request 12/12/03 for indefinite waiver	Comments, interventions due 3/31/04	Pending	
WY	70003-TA-03-85 CenturyTel of Wyoming	Filed request 12/12/03 for indefinite waiver	Century Tel requested to dismiss its application	Pending	
FCC	95-116 Franklin Telephone	9/24/03 filed for extension 12/8/04 Franklin filed to withdraw petition		Withdraw	
FCC	95-116 Yorkville Telephone (TN)	Request extension until 8/24/04	Comments due 4/12/04	Replies Due 4/22/04	Pending
FCC	95-116 North-Eastern Pennsylvania Telephone	Requests per switch extensions for 8 switches ranging from 5/1/04 to 12/31/05	FCC	Pending	

			releases		
FCC	95-116	TMP Jacksonville Wireless (IL & MO)	Request Extension until 11/24/04 Comments due 4/12/04 Replies Due 4/22/04 Pending	Pending	
FCC	95-116	Choice Wireless (OK & TX)	Request extension until 9/24/04 Comments due 4/12/04 Replies Due 4/22/04 Pending	Pending	
FCC	95-116	Leaco Rural Telephone Coop (NM)	4/2/04 Filed for suspension until 11/24/04 for the wireless portion of its switch	Pending	
FCC	95-116	Advantage Cellular	Filed 9/25/03 requesting waiver of LNP and pooling until 5/24/04 FCC Released order 5/10/04 denying petition	Denied	
FCC	95-116	Corr Wireless	Filed 10/21/03 requesting waiver of LNP and pooling until 5/24/04. FCC Released order 5/10/04 denying petition	Denied	
FCC	95-116	Plateau Telecom	Filed 10/30/03 requesting waiver of LNP and pooling until 5/24/04 FCC Released order 5/10/04 denying petition	Denied	
FCC	95-116	NOW Licenses (Dobson Cellular)	Filed 1/8/04 5/17/04 FCC granted suspension to 11/30/04	Granted	11/30/04
FCC	95-116	Texas RSA 8 South	Filed Request for 60-day extension	Pending	
FCC	95-116	Upper Peninsula Telephone	Filed 5/13/04 suspension for 18 of its 19 exchanges 4 exchanges to 1Q05, 3 exchanges to 4Q05, 5 exchanges to 4Q06, and 5 exchanges to 4Q07	Pending	



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Verizon Wireless Call Center Serves as Hub for Porting Activity

Tennessee Facility Prepared for Nationwide Launch

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05/24/2004

MURFREESBORO, TN — As the nation's wireless consumers take advantage of the coast-to-coast rollout of Local Number Portability today, the director of the Verizon Wireless call center in Murfreesboro, which serves as the hub for the company's LNP activities, says the company is uniquely prepared for those who want to switch wireless service providers while keeping their phone numbers

Shawn Stacy, call center director, said the company's experience last year has given his staff a firm grasp of best practices, lessons learned and realistic expectations as they prepare for the second phase of LNP that will help serve individuals and business customers porting their numbers

"As we've prepared for May 24, the two most important things we've done are to strengthen our relationships with our competitors and engage in testing with many of the smaller carriers that we'll be porting with for the first time. We have retrained our entire staff on the range of scenarios we'll encounter, including some of the key learnings from November," said Stacy

Stacy said Verizon Wireless' commitment to LNP – shown through its creation of the Murfreesboro call center – demonstrates the company's leadership role in the wireless industry when it comes to the porting process.

"Verizon Wireless is committed to making the switching process as quick and easy as possible. We consider ourselves a resource. That's our primary focus at the call center," said Stacy. "Our staff is well-trained and highly motivated to succeed."

About Verizon Wireless

Verizon Wireless is the nation's leading provider of wireless communications. The company has the largest nationwide wireless voice and data network and 39 million customers. Headquartered in Bedminster, N.J., Verizon Wireless is a joint venture of Verizon Communications (NYSE: VZ) and Vodafone (NYSE and LSE: VOD). Find more information on the Web at

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EXHIBIT

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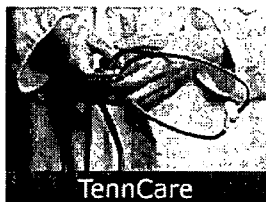
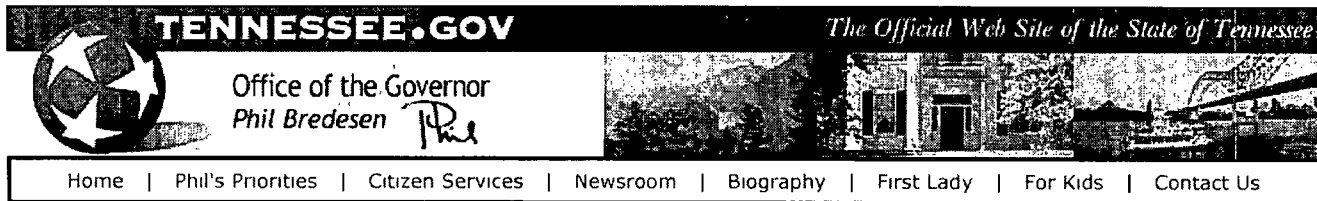
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EDITORS NOTE:

A Verizon Wireless video news release, broadcast-quality B-Roll and still images about local number portability are available online Log on to www.thenewsmarket.com/verizonwireless to preview and request video segments, which can be received in newsrooms digitally, by tape or via satellite The footage features customers porting their numbers, the porting process in Verizon Wireless stores, industry analyst comments, and special tips for consumers on how to port their numbers

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FOR IMMEDIATE RELEASE
MARCH 6, 2003

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GOVERNOR, VERIZON WIRELESS ANNOUNCE MURFREESBORO CALL CENTER

Company Will Provide Approximately 1,250 High-Paying Jobs

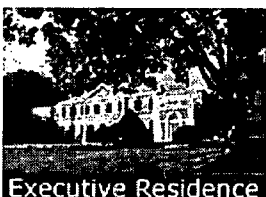


MURFREESBORO, TN— Gov. Phil Bredesen and Commissioner of Economic and Community Development Matthew Kisber announced today that Verizon Wireless, the nation's leading provider of wireless communications, is opening a customer call center in Murfreesboro.

Verizon Wireless will initially employ more than 400 people to begin operations in October 2003 with plans to grow to approximately 1,250 employees by the end of 2005. Total investment in the project by all partners involved totals \$24 million.



Bredesen and Kisber joined Murfreesboro Mayor Tommy Bragg and Rutherford County Executive Nancy Allen at this morning's announcement ceremony at the Rutherford County Chamber of Commerce.



Gov. Bredesen said the high-paying jobs provided by the customer call center will be a boon to Middle Tennessee and to the Murfreesboro economy.

"We are extremely proud that a world-class technology company such as Verizon Wireless has chosen to locate a new facility in Tennessee," Bredesen said. "Today's announcement is a great win for the community and for the state. The positive economic impact and jobs created by this announcement are precisely the type we are working to grow and recruit."



Shawn Stacy, director of the call center, which will be located in a 158,220 square foot facility at 300 River Rock Blvd. in Murfreesboro, said Verizon Wireless is proud to establish a significant presence in Middle Tennessee.

"Locating this customer call center in Murfreesboro is good news for Rutherford County and for the hundreds of local residents here and in surrounding counties who will join our team," he said. "This is also great news for Verizon Wireless. We are impressed with the strong, substantive focus on economic development in Tennessee and appreciate the efforts of Gov. Bredesen, Commissioner Kisber and the Rutherford County government and business leaders who helped bring this project to fruition. We look forward to further strengthening our involvement in this community."



Employees at the call center will handle the gamut of customer service calls from Verizon Wireless customers

Stacy said Verizon Wireless would begin recruiting for the call center in June, with employee training starting in August. The call center will begin operations in October 2003. Those interested in applying for jobs at the call center should call 1-800-808-9738. The hotline will provide callers with information on how to apply for these jobs.

The Verizon Wireless announcement fits squarely into the Bredesen

administration's broader "Jobs Cabinet" strategy to recruit high-quality jobs in existing industries and companies. Verizon Wireless already has one customer call center in Nashville.

"We're very pleased that Verizon Wireless liked Middle Tennessee so much that it wanted to keep growing here," Kisber said. "No doubt, they will be an active and successful corporate citizen in Rutherford County."

Verizon Wireless is the third economic-development announcement of Bredesen's new administration. It comes one day after the Governor announced plans for a new Bridgestone APM manufacturing plant in Dickson and less than two weeks after he announced plans for a Toyota manufacturing plant in Jackson.

This initiative falls squarely in line with Verizon Wireless' workforce development initiative to provide high-paying jobs and outstanding benefits to employees.

About Verizon Wireless

Verizon Wireless is the nation's leading provider of wireless communications. The company has the largest nationwide wireless voice and data network and 32.5 million customers. Headquartered in Bedminster, NJ, Verizon Wireless is a joint venture of Verizon Communications (NYSE:VZ) and Vodafone (NYSE and LSE: VOD). Find more information on the Web at www.verizonwireless.com

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